

Larry Hogan, Governor  
Boyd Rutherford, Lt. Governor



Robert S. McCord, Secretary  
Sandy Schrader, Deputy Secretary

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## Maryland DEPARTMENT OF PLANNING

August 25, 2021

Ms. Kimberly Golden Brandt  
Livable Frederick Director  
Frederick County Planning Department  
30 North Market Street  
Frederick, MD 21701

Re: Draft of The Sugarloaf Treasured Landscape Management Plan

Dear Ms. Brandt:

Thank you for reaching out to the Maryland Department of Planning (Planning) to provide comments on the draft Sugarloaf Treasured Landscape Management Plan (Plan) during the public comment period, prior to the Planning Commission's review of the draft Plan. As noted in the Introduction of the Livable Frederick Master Plan, "As Community and Corridor plans, large area plans, and functional plans are adopted, they will constitute amendments to the Livable Frederick Comprehensive Plan." (page 14) It is our understanding that after the Planning Commission reviews the draft Plan, a formal transmission of the draft Plan will be sent to Planning for the traditional 60-Day Review Period. At that time, we encourage you to send the draft Plan to Montgomery County and other interested jurisdictions for review and comment.

The Department has not forwarded a copy of the Draft Plan to State agencies at this time and the comments contained in this letter reflect a preliminary analysis by Planning staff.

If you have any questions or concerns regarding these comments, please email me at [susan.llareus@maryland.gov](mailto:susan.llareus@maryland.gov) or Daniel Rosen, AICP, Resource Conservation Planner at [dan.rosen@maryland.gov](mailto:dan.rosen@maryland.gov)

Sincerely,

Susan Llareus, PLA  
Planning Supervisor for the Maryland Capital Region

cc: Chuck Boyd, Joseph Griffiths, Daniel Rosen, Planning



**Draft of The Sugarloaf Treasured Landscape Management Plan**  
**August 25, 2021**  
**Preliminary Review Comments**

The *Livable Frederick Master Plan* (LFMP) was adopted September 3, 2019. The LFMP sets forth the vision of creating a large area plan to “provide focus on contiguous regions of the county, such as the Middletown Valley or the landscape and historic resources surrounding Sugarloaf Mountain” (page 17). The draft Sugarloaf Treasured Landscape Management Plan (the Plan) discusses the significance of the Sugarloaf Mountain area as contributing to the green infrastructure network of the county as one of the major forested areas, its ecological systems associated with the Monocacy River, and as part of the protected lands of the county (page 49). The Plan also describes the Sugarloaf Mountain Rural Heritage Landscape area as follows:

“This valued rural preserve, punctuated by the visual prominence of the mountain’s dual peaks, and grounded by the beauty and history in the surrounding fields and forests, is recognized as a special place even in a county that is home to many special places.” (page 58)

The LFMP notes that the area demarcated as the “Sugarloaf Mountain Historic Survey District” covers approximately 10,500 acres of land and indicates there are a number of long-term protective easements established in the area of Sugarloaf Mountain. But even with the protections that exist today, the LFMP indicates that the area remains “vulnerable” and that additional land protection is needed for environmental areas to avoid degradation and protect the viewshed. The Frederick County Planning Commission and staff from the Livable Frederick Planning and Design Office, in response to these identified concerns, have prepared the Sugarloaf Treasured Landscape Management Plan as a large area plan that proposes to refine the vision and identify tools to achieve the policies and goals of the LFMP.

The draft plan includes a land area larger than the “Sugarloaf Mountain Historic Survey District”. The Plan consists of approximately 17,140 acres located in the southern region of the county, west of I-270, north of the Montgomery County line and east of the Monocacy River. The vision of the plan describes the unique geologic landform, the scenic and rural landscape and promotes stewardship and sustainability (page 5). The plan includes three major goals:

- Protect and enhance the Sugarloaf Area’s natural resources and environmental assets, including its forests, waters, biodiversity, and wildlife habitats.
- Strengthen the distinct place-based identity of the Sugarloaf Area through the stewardship of its scenic and rural character, and its agricultural and cultural resources.
- Foster a resilient human ecology through the mitigation of, and adaptation to, climate change.

**Section Specific Comments:**

**Introduction and Background** -This chapter explains the purpose of the Plan and how it complements Frederick County’s other planning efforts. The vision statement, goals, and geographical context are presented well

The legend on Map 1-1 (page 8) could be expanded to include identification of the beige (parcel lines) and blue (streams) and major roadways should be identified for clarity. It could be that the use of the satellite imaging base map is making it hard to read. Also, the color of the Stronghold Incorporated holdings on Map 1-2 (page 9) looks different from the color used in the legend.

**History and Culture** -This chapter is interesting and provides a complete description of the European Settlement. Embedded in the first paragraph is a mention of the Native Americans who lived in the area. It would be more inclusive if this earlier time frame were expanded upon. This would be consistent with Initiative 2A (page 15).

The Historic Sites within the Sugarloaf Planning Area map on page 17 is visually busy and might be more comprehensible if the photos appeared on a separate page and the study area enlarged. Again, the use of satellite imaging in the background may be contributing to the difficulties in reading the mapping. Planning suggests that some mapping might be more appropriately mapped without satellite imaging as the base map (see below).

**Stronghold Incorporated and Sugarloaf Mountain**-This chapter explains the many important natural resources found in the area of Sugarloaf Mountain: Wetlands of Special State Concern, National Natural Landmark, State Forests of Recognized Importance, Green Infrastructure, Ecologically Significant Areas, Forest Legacy Area, rare species, etc.

The role of Sugarloaf Mountain in Frank Lloyd Wright's career is fascinating and will come as a surprise to many readers. An identification of the Wright building on page 24 would be appreciated. The story of the post office mural of Sugarloaf Mountain is also interesting and well-illustrated.

Planning supports the initiatives on pages 26 and 27. Initiative 3E on page 30 states:

"Support the preservation of Stronghold, Incorporated's 3,400 acres through a conservation easement device to ensure permanence and protection of all of its resources — cultural, environmental, historic — with no reduction in size, integrity, or ecological function."

This statement needs elaboration to address the end of the Stronghold Trust in 2046. The question raised in the reader's mind is, who will hold the easement? Is the Stronghold Trust able to engage in an easement at this time or must the trust reach the expiration before another easement could be placed on the property? This is a legal matter that should be addressed prior to plan adoption, as the plan should recognize that the cooperation of the landowner (Stronghold Trust) is needed to ensure a perpetual easement. The government cannot just place an easement over the property, yet citizens reading the document might not understand this legal aspect.

Planning understands the dilemma of future operational status and management beyond 2046 and recognizes there may be a desire to continue to realize Gordon Strong's vision in perpetuity for all people in future generations. Ideally, the mission of Stronghold, Incorporated of environmental protection, education, and appreciation of natural beauty will live beyond 2046.

**Land Use** -It would be helpful for the community to understand how this plan will integrate into the existing regulatory plans such as the Livable Fredrick Master Plan and the Comprehensive Plan Map. If it is the intent of the draft Plan's Comprehensive Plan Land Use Designations (Maps 4-2 and 4-3) are to replace a portion of the 2010 (amended 2012) Land Use Plan Map adopted by reference in the LFMP, it is recommended that the county-wide Comprehensive Land Use Plan Map be appropriately amended to reference the newly refined area depicted on Maps 4-2 and 4-3 (pages 47-48).

Page 34 mentions the existing very low-density development in the planning area. Details are provided later, but Planning suggests that the county consider whether it might be better to insert here

how many acres are involved and to show it on a map. Planning supports policies 4-1 through 4-4, though perhaps the Plan should mention that further details about “land use designations, zoning classifications, and development densities” will appear later in the Plan.

Planning agrees with Initiative 4B which mentions Best Available Technology (BAT) upgrades for new or replaced non-residential on-site sewage disposal systems and suggests that the draft Plan also mention how best to address residential septic systems. Initiative 4C mentions coordination with local fire departments about spills of hazardous materials. This initiative deals with cleaning up hazardous materials; the plan might also benefit from a discussion of whether the “forever chemical” family of PFAS, contained in fire-fighting foam, pose a threat to the planning area.

One page 38, the Plan references the “2010 Comprehensive Plan Land Use Plan Map” and associated land use designations. Planning recommends the county consider deleting the reference to the year 2010 in the future and simple reference the “The Comprehensive Plan Map” consistent with the LFMP on page 198 of that document. The land use map will continue to evolve as this and other large and small area plans are adopted in the future, and continually referencing the year 2010 may cause confusion after numerous amendments.

Maps 4-2 and 4-3 provide a comparison of the current land uses to the proposed land uses of the Plan. If adopted, it is appropriate that the resolution include language specifically stating that the Plan amends the LFMP and the Comprehensive Plan Map land use designations. Planning cautions that without an updated county-wide land use plan, the incremental replacement by land use designations established in this and other future large area plans, corridor plans, functional plans, etc... the original 2010 Land Use Plan Map will become increasingly disconnected.

For informational purposes, it might be helpful to indicate that the public can reference the current land use maps electronically at: <https://gis-fcgmd.opendata.arcgis.com/pages/map-atlases>. It is also understood that the same land use information is contained on the [Frederic County Maryland Property Explorer GIS](#) mapping tool, under the land use layer.

The heading for Table 1A should add “Land Use” after “Comprehensive Plan.”

Page 41: It’s not clear why 1,019 acres of the Planning Areas are proposed to be added to the Resource Conservation Zone, which would allow 10-acres lots, and 1,023 acres removed from Agricultural Zoning. It appears that Agricultural Zoning category allows 3 lots plus the remainder from original tracts of as of August 18, 1976; additional cluster subdivision rights of one additional lot per 50 acres on tracts 25 acres or more are permitted; and lots are to be clustered between 40,000 square feet and 2 acres. Will the 3 lots plus the remainder restriction still apply? An explanation of how the change from Agricultural zoning to Resource Conservation zoning is more protective of farmland would be helpful.

Policy 4-4 on page 43 provides an important recognition of the relationship and potential impact of the Urbana CGA and I-270 Corridor on the Sugarloaf Planning Area; however, “include visually attractive and high-quality design elements” is vague. Planning suggests considering more specific language to address viewshed concerns or desired design guidelines.

Regarding the list of easement and land purchase programs described on pages 44-46, perhaps a simple preserved lands maps would be useful here, showing land under easement in one color, publicly owned lands in another, and the Stronghold lands in a third. Policies 4.5-4.8 are important strategies to protect the agricultural character of the Planning Areas, especially the excellent idea of adding to the Carrollton Manor Rural Legacy Area the portions of the Planning Area not already included.

The colors on the Comprehensive Plan Land Use Designation map on page 48 are hard to differentiate. Again, this could be attributed to the use of the satellite imaging as a base map. Also, it seems that some colors in the legend do not appear on the map. The same applies to the maps on pages 49 and 50. For the Subdivisions map on page 51, it might be worthwhile to show, in sharp contrast, the parcels that are preserved.

For the map on page 53 ("Comprehensive Plan – Proposed Land Use Plan Designation Changes"), "Agricultural / Rural" appears in the legend, but it does not appear on the map. The polygon that might be Agricultural/ Rural in the upper right-hand part of the map appears black and white, a pattern not shown in the legend. Similarly, the Agriculture pattern from the legend does not appear on the maps on pages 57 and 58.

**Sugarloaf Rural Heritage Overlay Zoning District**-The Sugarloaf Rural Heritage Overlay Zoning District Overlay (Overlay) and its regulations are proposed to cover the entirety of the Planning Area and provide a way to use the Planning Area's resources in a limited, sustainable way. The objectives and goals of the overlay include the following:

- To address the scale and visual impact of land uses and development that can degrade rural qualities, excessively burden the transportation network, and overwhelm the scenic and rural nature of the Sugarloaf Planning Area.
- To minimize adverse impacts of land development activities on forestlands and natural habitats.
- To regulate the amount of impervious surfaces to control the volume of stormwater runoff and stream bank erosion, maintain levels of groundwater infiltration, and retain as many of the functions provided by natural land as possible.

A review of the information contained in the Appendix shows that the development of the proposed regulatory framework (page A-19) is a draft, but some clarity is needed. Planning has the following comments relating to the framework:

- Page A-19 states that the maximum gross building area of a new structure for non-residential use will be 15,000 square feet. Is there justification for this maximum size? An exception is allowed to the maximum 15,000 square foot non-residential building size on page A-19, states:  
"Request to exceed the maximum gross building area of 15,000 square feet for new non-residential buildings or expansions/enlargements may be granted by the body or entity with specific approval authority upon review of a justification statement from the applicant/owner that addresses and describes, in detail, the following:
  - The unique needs of the proposed activity or use that warrant a non-residential building larger than 15,000 square feet; and
  - The site design elements and building design features, such as enhanced energy efficiency, water conservation (e.g., re-use, consumption reductions), and stormwater runoff controls, or other measures that will be utilized to minimize negative impacts to natural resources and surrounding properties that may result from the overall development proposal and increased building square footage."

Planning suggests that the consideration of site design elements be expanded to include limiting impervious areas on the site, incentivizing green roof and green screen systems, maximizing tree canopy, and requiring a system to quantify how the project features energy usage better than the existing code requires.

- As a new overlay district, shouldn't the Sugarloaf Rural Heritage Overlay Zone be designated by its own initials (e.g., SRH)?
- The Design Standards on page A-20 could benefit from illustrations.

- The Overlay appears to be requiring a natural resources inventory for zoning cases, but it does not seem to be requiring the same for a subdivision plan (page A-21). Since the layout of lots are established in the entitlement process through the approval of a subdivision, Planning assumes that a natural resources inventory is already required through the subdivision process. If not, then the county should consider this requirement for this planning area and beyond. The following website may be useful in addressing all aspect of a natural resources inventory:  
<https://www.pgparcs.com/1565/Natural-Resource-Inventories-NRIs>
- Will private schools, philanthropic, or other institutional uses be permitted in the overlay zone?
- Should the reader assume that the uses shown under other zoning districts in the table on page A-25 also apply to the Rural Overlay Zone?
- The Plan should clearly state that only those requirements of the underlying zones specifically noted in the overlay zone are modified and all other requirements of the underlying zones are unaffected by the overlay zone.

**Transportation Network** -Planning applauds Initiative 5D on page 72 to establish scenic road designations and encourages developing design standards for the protection of these scenic roadways and the viewsheds beyond the corridors. Montgomery County is currently working on a scenic road functional master plan for the entire county and there are plenty of resources on their website that may be helpful:

<https://montgomeryplanning.org/planning/transportation/highway-planning/rustic-roads/>

**Watershed Water Quality**-To avoid confusion, the second paragraph of page 76 should indicate that the “numeric criteria for water quality” are the use Classes I to IV described at the bottom of the page, and that the “P” can sometimes follow those numerals.

Figure 3 is somewhat confusing and should be enlarged and explained in layman’s terms. It is difficult to understand.

Policy 6-10 on page 91 states:

“Critically examine quantities of groundwater requested for future withdrawals by large-scale commercial and institutional uses in order to maintain springs and seeps, and to ensure stream base flows needed for sensitive cold-water aquatic biota and protection of nearby private residential wells.”

The plan could explain what the county will do if future requested withdrawals are too large. Since the county does not have control over groundwater appropriations, it is anticipated that the county will work with the Maryland Department of Environment to determine possible methods to protect these sensitive water resources.

**Forestlands, Green Infrastructure, and Biodiversity** -Planning asks for clarification on page 113, map 7-1. Tier 4 and Tier 5 appear in the map legend, but none of the areas on the map are shaded in their colors, although the text says the acreage exists.

**Climate Change** -The policies and initiatives in this chapter are good; those under the Agriculture and Carbon Sequestration Section in particular are innovative, and Planning is interested in learning of their progress. Planning notes that the Fourth National Climate Assessment from 2018, referred to on page 119, is still the most recent. The next Assessment is scheduled for release in 2023. Also, the Plan refers to some horrendous events exacerbated by climate change in 2020; since this year is worse, perhaps some reference to droughts, forest fires, etc. from 2021 can be included.



Noel S. Manalo  
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nmanalo@milesstockbridge.com

September 1, 2021

Kimberly Brandt  
Frederick County, Maryland  
30 North Market Street  
Frederick, MD 21701

Re: July 2021 Draft Sugarloaf Treasured Landscape Management Plan  
("Draft Plan")

Dear Ms. Brandt:

On behalf of Stronghold, Incorporated ("Stronghold"), I am writing to express Stronghold's objection to the Draft Plan. We appreciate Frederick County Staff's collaboration and communication throughout the Draft Plan's process. In addition, we appreciate the County including Stronghold representatives in the Draft Plan Steering Committee.

By transmission dated October 29, 2020, Stronghold provided to County Staff a proposed "STR Zone" concept. It was our thought and hope that the Draft Plan process could facilitate creating zoning options for the Mountain that would optimize Stronghold's mission efforts now and in the future.

It does not appear the Draft Plan acknowledges any of this, short of perhaps some of the background information.

Herein you will find some section-by-section comments to the Draft Plan. Generally, the land use and zoning regulations referenced in the Draft Plan are troubling. The Draft Plan calls for zoning and use restrictions that could render Stronghold's operations non-conforming, non-compliant and not feasible.

After you have reviewed this letter, we hope to further discuss with you our objections (taking you up on your previous offer to meet and discuss),

so that the County can better understand why Stronghold does not support the Draft Plan.

To the extent we do not itemize below particular portions of the Draft Plan, you are not to imply concurrence, and we reserve the right to articulate additional comments to the Draft Plan in its current form and in future versions.

### Introduction and Background

1. Pages 1-3 should incorporate a clearer discussion of if/how the Draft Plan results in Comprehensive Plan Map (Land Use Designation) changes and/or zoning changes to specific properties. Language tracking the explanations in Livable Frederick Master Plan (“LFMP”) pages 15-18, for example, would help.

2. Policy 1.3 (“Ensure that residents, businesses, and students have access to practical and affordable high-speed data services”) appears to be out of place in the Draft Plan. Of what relevance is this to the Planning Area. If there is one, the Draft Plan should explain it.

3. The Planning Area Boundary (Draft Plan p. 8) now excludes a large amount of acreage along I-270 that was included in the original Planning Area Boundary presented to the public previously. What is the rationale for this, as we understood I-270 to be the “hard boundary”.

### History and Culture

1. Page 13 discusses a “National Register nomination for the Sugarloaf Mountain Historic District”, and an eligibility determination for listing on the National Register by the Maryland Historical Trust. The Draft Plan should explain why the District was not submitted to the National Park Service for consideration.

2. Sugarloaf objects to Initiative 2D (Draft Plan p. 15 – “Pursue a National Register District nomination for the Stronghold Survey District, which is included in the Maryland Inventory of Historic Properties as record F-7-32.”). Property owners should have some input on whether or not to pursue this.



### Stronghold Incorporated and Sugarloaf Mountain

1. Page 19, para. 1 – define “Wetlands of Special State Concern.”
2. Delete “publicly-accessible” from Policy 3.1 (*i.e.*, “Promote Sugarloaf Mountain and the surrounding lands owned by Stronghold, Incorporated as a national model for privately-owned, ~~publicly-accessible~~ open space conservation that provides environmental and health benefits to residents of a major metropolitan area.”). As Stronghold owns the Mountain and its surroundings, accessibility to invitees and guests will be determined by Stronghold. Policy 3.1 should not create any expectations in the reader.
3. Page 23. The picture purports to be of Gordon Strong. The person identified in the picture is not Gordon Strong.
4. Delete Initiative 3C (Draft Plan page 25 – “Partner with Stronghold, Incorporated to establish mechanisms to ensure long-term public access to Sugarloaf Mountain and identify ways in which Frederick County community (residents, government, private organizations) can assist in these endeavors”), for the same reasons discussed above, regarding creating expectations.
5. Stronghold supports Initiative 3D (*Id.* – “Initiate inter-governmental communication with the Maryland State Highway Administration to request a revised signage palette along I-270 and Comus Road for Sugarloaf Mountain that contains variations in color, style, and type design to distinguish the privately-owned mountain from publicly-owned parkland.”) and supports any efforts in this regard.
6. Delete Initiative 3E (*Id.* at 28 – “Support the preservation of Stronghold, Incorporated’s 3,400 acres through a conservation easement device to ensure permanence and protection of all its resources – cultural, environmental, historic – with no reduction in size, integrity, or ecological function.”). This is a breathtaking proposition to publicize prior to discussion with us. It indicates a severe regulatory restriction of property rights, and Stronghold can only read this as hostile in intent.

### Land Use

1. Under “Land Use Tools” on page 31 – there should be a discussion and recognition of the concept of existing non-conforming uses, *i.e.*, uses that existed prior to the Frederick County Zoning Ordinance.

2. Policy 4.1 – add language acknowledging existing practices on the Stronghold property, or add a carve out exception for Stronghold property.
3. Policies 4.2 & 4.3 – same comment as # 2 above.
4. Initiatives 4A & 4B (page 36) should include language referencing “with the cooperation of property owners”.
5. Treasured Landscape-Sugarloaf designation, Initiatives 4D-4F, and all accompanying Policies and Maps (Draft Plan pp. 37-59) should all be defined in a way that aligns with Sugarloaf’s proposed STR Zone.
6. Delete Initiative 4G (“Pursue the proposed expansion of the Carrollton Manor Rural Legacy Area to include all of Stronghold, Incorporated’s holdings, adjacent forestlands, and agricultural lands with the Sugarloaf Planning Area”). Similar to our comments to Initiative 3E above, this is a breathtaking proposition to publicize prior to discussion with us. It indicates a severe regulatory restriction of property rights, and Stronghold can only read this as hostile in intent.

#### Transportation Network

1. Initiative 5D (“Establish a new ‘Scenic Road’ designation to augment and compliment the County’s Rural Roads Program . . .”) should reference the considerations of the STR Zone, to the extent the Initiative implicates roads serving and impacting Stronghold property.

#### Watershed Water Quality

1. Delete Initiative 6A (“Establish non-residential and non-agricultural building size thresholds in the Sugarloaf Planning Area to reduce impervious surfaces, stormwater runoff, and degradation of aquatic resources.”) or add language carving out, or making exception for, Stronghold property.
2. All references to monitoring and measuring functions, data collection, and data measurement in this chapter should reference “with the cooperation of property owners”.

Forestlands, Green Infrastructure, and Biodiversity

1. There should be language added that acknowledges the established (and recognized as exemplary) practices on the Stronghold property. Any legislation arising from this section should not inhibit or otherwise limit Stronghold's current conservation practices, both current and futures.

Appendix

1. "Sugarloaf Rural Heritage Overlay Zoning District Regulations". The provisions of this section should not apply to Sugarloaf property. Add STR Zone for Sugarloaf property.

Thank you for providing the Draft Plan. We look forward to further discussing our concerns with you, the Steering Committee, the Planning Commission and the County Council.

Sincerely,



NOEL S. MANALO

cc: Kathy L. Mitchell, Esquire  
Stronghold, Incorporated  
Walter C. Martz, II, Esquire



## Dolan, Mary

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**From:** Dimitriou, John  
**Sent:** Tuesday, August 31, 2021 1:25 PM  
**To:** Goodfellow, Tim; Brandt, Kimberly G.; Superczynski, Denis  
**Subject:** FW: An email reply to The Sugarloaf Area Plan needs your review

Thanks,

**John Dimitriou, RA**

Livable Frederick Design Planner  
[jdimitriou@frederickcountymd.gov](mailto:jdimitriou@frederickcountymd.gov)  
(301) 600-1150

**From:** PublicInput.com Alerts <ProjectEmail\_938276@publicinput.com>  
**Sent:** Tuesday, August 31, 2021 1:08 PM  
**To:** Dimitriou, John <JDimitriou@FrederickCountyMD.gov>  
**Subject:** An email reply to The Sugarloaf Area Plan needs your review

[EXTERNAL EMAIL]

--- Reply above this line ---

An email comment has been received. It was posted in response to "*The Sugarloaf Area Plan*".  
This comment can be reviewed [here](#).

**From:** [gunsalpp@comcast.net](mailto:gunsalpp@comcast.net)  
**To:** [F581@PublicInput.com](mailto:F581@PublicInput.com)  
**Subject:** No Cutouts / Sugarloaf Needs the Buffer of I-270

Hi, my name is Pandora Gunsallus. I own about 25 acres of farmland near the corner Rt. 80 and Parks Mill Rd. My farm was part of a larger farm (about 366 acres) bought by my grandparents around the turn of the previous (20th) century. The address is 3350 Parks Mill Rd. My farm sits behind and abuts Johanna Springston's farm and house, which is directly across from the large tract of farmland owned by the developer, Mr. Natelli.

I listened in on both open houses (17th & 19th of Aug. 2021) and agree with my neighbors that I-270 should be restored as the dividing line between the ongoing development east of I-270 and the Sugarloaf Mountain area west of I-270. The Sugarloaf Mtn. area needs the natural buffer of land between Rt. 80 and I-270, to protect its' residents and natural habitat from heavy development. We need the buffer to protect the area as a whole because it is one of the gateways to this treasured region. When people turn off of 355 onto Parks Mill Rd. there is a sigh of relief as you start to enter this bucolic haven of Frederick County. These buffers or gateways need to remain free of the urban sprawl that has plagued so many nearby areas, like Rockville and Gaithersburg for decades. Why would we as a county want to go the way of these other

overrun, busy areas? We must protect all of Rt. 80, as well as the Thurston Road area, in order to secure the outskirts of this treasured region.

We as a county should be wary of the slippery slope these 2 cutouts could mean for our way of life and our environment. Rt. 80 and Parks Mill Rd. at 355, as well as Thurston Rd. should remain inside the Sugarloaf TLM Plan, like they have been for decades and should not be sacrificed for heavy development which would degrade the very area that we are trying to protect.

The Sugarloaf Area Vision Statement talks about our shared environment. Waters and streams originate from somewhere and flow out. Some of these waters originate and flow through the 2 Natelli cutouts. The habitat there will be destroyed, the streams poisoned and all of that will flow out into the preserved area. This reality supports the need to keep the 2 cutouts inside the protected area. Allowing these 2 cutouts to be developed is the antithesis of what the Sugarloaf Plan states. You can't say repeatedly, that you want to preserve the waters and also ruin the watershed with more development. Both statements can't be true. One of them is a falsehood. You can't say you want to protect the Sugarloaf region fully and extract these two parcels. According to the Sugarloaf Plan there are already existing water quality issues, which are affecting the streams and waterways in the area. If preservation of the environment is a high priority of this Plan, then why risk further degradation of the waterways in the areas of potential development. We can't pick up the streams that feed the Monocacy River out to the Chesapeake Bay and move them. But we can choose to honor the original boundary of I-270 and protect them!

Just like the waters, streams and creeks are connected, so are the forests, biodiversity and wildlife habitats. If the goal is to "Strengthen the distinct place-based identity of the Sugarloaf Area" then why would you attempt to develop so close to the protected Sugarloaf Plan? You can't take trees away in these areas and think you'll be doing good by planting trees elsewhere. You will ruin the entirety of the habitats within these vital cutouts altogether. They are too close to the protected area. We need to hold the lines of development at I-270, we need this buffer. As for the replanting of the trees, you can't rob Peter to pay Paul. Peter is left broke, and what has been a thriving natural habitat for millennia will cease to exist!

I am concerned the property owners along Fingerboard and Thurston Roads will no longer enjoy the peacefulness of our farms and homes where we chose to live and put down roots, if our way of life is shattered by this intended development. The future of peoples' lives will be negatively impacted and they may want to sell their homes and farms to get away from added traffic, noise pollution, hindered night-time sky visibility from added lights that intense development will bring. Where are we to go, possibly a developer funded reservation in Kansas! We are your residents who have lived here for decades, all our lives, paying our taxes, supporting local businesses, buying goods and services, and being good stewards of our land. Our concerns for these two cut-outs should come first!

I am furious that Frederick county presented this boundary line change to me via a postcard at the beginning of August 2021. Why weren't residents included from the beginning with full transparency at all meetings. This process needs to come to a full stop because of the underhanded and rushed way it is being executed.

Who's idea was this? When did it originate? Who was at these meetings? Why wasn't I notified?

Sincerely,  
Pandora Gunsallus

Sent from my iPad







Earl D. Reaves, Jr. CF, Chairperson  
26 Brookfield Road  
Pasadena, Maryland 21122  
410.746.7402  
budreaves@gmail.com

August 31, 2021

Fredrick County Planning and Permitting  
Steve Horn, Director  
30 N. Market St.  
Frederick, MD 2170

Dear Mr. Horn:

The MD-DE Division of the Society of American Foresters is the professional association that represents professional foresters in Maryland and is a Division of the National Society of American Foresters representing approximately 10,000 professional foresters across the country. We appreciate the work the Frederick County Planning and Zoning has done on the Sugarloaf Planning Area Plan and believe there are many positive recommendations in the Plan. However, there are two items in the Plan which we believe are counterproductive to the goals of the plan, which we would request be removed.

The first issue is located on page A-22 of the Sugarloaf Planning Area Plan and involves the completion of an invasive species survey and post-harvest management plan for their control. This will add an additional step, and a very significant expense, to the permitting process by requiring an additional survey to be completed and an additional plan being drawn up. Further, since it is well known that invasives exist across much of the forest landscape, and invasives control is highly difficult and expensive, with or without forest harvesting, this requirement creates a strong disincentive against forest harvesting – e.g., the only landowners singled out to do any invasives control will be those who want to conduct a forest harvest. In addition, invasive species concerns are already addressed as a corollary to “best management practices” delineated in the 2015 Forest Harvest Operations Manual (page 14) that foresters and operators already follow when planning timber harvests.

Second, on page A-23, the proposed regulatory framework would require a review of rare, threatened and endangered species by Maryland DNR Heritage Service, and potentially a mitigation plan prepared to address any comments that may be provided. This requirement will also add a very significant expense and administrative burden to obtaining a forest harvest permit. It is clear from the data included in the Sugarloaf Plan that FIDS habitat is present, to one degree or another, in almost all forest areas in the planning area, so this proposed requirement appears to mandate some type of mitigation plan for virtually every harvest. This is another time consuming and lengthy process that can add weeks or months to a forest harvest permit. Since timing can be a very important component to good forest harvesting, this creates another disincentive to good forest management.

Thank you very much for the opportunity to comment. Once again, we respectfully request that the Planning and Zoning Department remove both of the above mentioned items from the regulatory framework proposed by the Sugarloaf Planning Area Plan. If you would like to further discuss these items, I can be reached by email at [budreaves@gmail.com](mailto:budreaves@gmail.com), or by phone at 410.746.7402.

Sincerely,

A handwritten signature in cursive script, reading "Earl D. Reaves, Jr.".

Earl D. Reaves, Jr. CF

cc: Tim Goodfellow, Livable Frederick Environmental Planner

## Dolan, Mary

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**From:** James Gunsallus <gunsaljm@comcast.net>  
**Sent:** Monday, August 30, 2021 12:16 PM  
**To:** Gardner, Jan; Council Members; Planning Commission; Sugarloaf Area Plan; F581@PublicInput.com  
**Cc:** kaihagen@gmail.com; kai@catocinmountain.com; Goodfellow, Tim; friendupdates@facebookmail.com; tinaartbrown@gmail.com; johannaspringston@gmail.com; gunsalpp@comcast.net  
**Subject:** Move the Line Back to I-270 / No Development West of I-270

[EXTERNAL EMAIL]

Frederick County Council Members,

My name is James Gunsallus. My wife and I are proud landowners of a 25-acre parcel at 3350 Parks Mill Road. I have the following comments to support why I believe the line in the Sugarloaf Plan needs to be moved back to I-270. And why the recent "cut-outs" on the new map need to be removed.

There is nothing more natural to me then the division of the East and West sides of I-270, just as it is today from the Montgomery County Line all the way to the Monocacy Battlefield.

I would like to say the Sugarloaf Treasured Landscape Management Plan is quite a document. It is well written and seems to be well researched. It contains all the reasons why further development West of I-270 should be avoided.

I'm hopeful through your review of the following bullet points in the Sugarloaf Plan, you will reconsider and understand why development should never happen West of I-270.

There are numerous statements and references that directly contradict the intent of the Sugarloaf Plan in regards to the developer holdings, if they were to be developed.

These many statements in the Sugarloaf Plan support exactly why further development should not be allowed West of I-270. I-270 is the natural buffer between the East and West sides of the Interstate.

It seems to me that the Plan was drafted and far enough along, when it was realized the developer owned these properties, and since there was no possible way for him to meet the plan policies, if he was to develop, he was given some kind of exception so he did not have to abide by the Sugarloaf Plan Policies. I have a huge problem with this! That by itself, tells me there is no sincerity whatsoever in that decision or the preservation of the area, as represented by the plan.

Please review the following points in the Sugarloaf Plan.

- The last sentence on page 2 into page 3.
  - This statement is the "kick-off" as to why not to develop. As stated, the surrounding lands and waterways need to be a primary focus of this plan and not be ignored because of some developer's "cut-outs". Economic vitality doesn't have to be more villages and storefronts or highway interchanges.
- The fifth full paragraph on page 3.
  - The Sugarloaf Planning Area possesses multiple environmental elements that make it highly sensitive to change, including extensive and contiguous forestlands, significant wildlife habitat, high-quality waters, and the only mountain in the Maryland Piedmont. The Sugarloaf Treasured Landscape Management Plan articulates the rationale and need for stewardship, preservation, and enhancement of these environmental resources. The Plan focuses on the protection of the natural resource base and rural landscape of the Sugarloaf Area. How would further development on the West side of I-270 support this statement?
- The last paragraph on page 3.
  - This speaks of the Stakeholder's Advisory Group being such an important part of the Plan. Why weren't the Stakeholder's, one and all, notified until months later of the map changes? Was this to quell any negative responses to the privileges afforded the developer and slow down a timely response, before

the County makes decisions to approve? At least one member being told it was done and couldn't be changed?

- Policies 1.1 & 1.2 on page 7.
  - I don't see a vision for any kind of development that would support these two policies, if development occurs West of I-270. 1.1 tells me to leave the development on the East side of I-270, so policy 1.2 can be supported.
- While the pages covering all the history of the area are well and good; the pages which discuss Mr. Strong standing up to Frank Lloyd Wright to not build or develop in the area, are obviously the exact reason why any other developer should not be allowed to develop further West of I-270. It is apparent the development vision of F.L.W. eventually violated the integrity of the mountain, similar to what will happen if more development comes West of I-270, violating a bucolic, serene area, adding the congestion and noise of traffic, along with reduced air quality. Once again, I say I-270 is a natural border and buffer to the East side.
- The last sentence on page 33 leads me to believe that the County is already "on board" with the current developer of the East side of I-270 and gave him the "free-pass" to develop West of I-270 through the "zoning exceptions" already discussed at the virtual meetings. Based on this statement, the County had no requirement to let the residents or the Stakeholder's review it before they approved it. So much for the open, transparent and forthcoming communication the County wants the residents to believe is happening.
- The last sentence in the second paragraph and the third paragraph on page 34.
  - Perfect examples of the potential negative impact of development West of I-270. What of the watersheds and the currently minimized forested areas in the developer's holdings? Since he's been given an "exception" to develop and doesn't have to abide by any of these policies; it's just okay to cut down the remaining trees and what will happen to the headwaters in the Urbana area currently on the developer's land in the "cut-outs"? The last paragraph on this page again supports the reason why development should not occur West of I-270.
- Policy 4.1, page 34 will be directly violated by giving the exception to develop in the "cut-outs".
  - This policy should be taken out of the plan, if development, either residential and/or commercial is to happen West of I-270. There needs to remain a natural buffer between the East side and the West side of I-270! The "cut-outs" do not provide any kind of buffer whatsoever! Just the fact they are being called "cut-outs" should be a clue as to why they are not good for the plan!
- Policy 4.2, page 36 and the first paragraph discuss the lack of planning that exists for public water and sewage systems, which no doubt will have to be evaluated prior to development.
  - Can the County guarantee the integrity of the current residents' wells at the new boundaries of the "cut-outs"? Has anyone bothered to study this yet?
- Policy 4.3, page 36 states that new residential development has to be minimized in regard to water wells and septic systems.
  - So, I guess that means further development will require public works systems being installed West of I-270 for any residential or commercial growth, further violating other policies in the plan and not in line with the vision of the plan in the first place? Does this mean the developer's "cut-outs" never mattered with respect to Rural or Agricultural Lands?
- Page 38; the first and third paragraphs state the potential groundwater issues and once again, another Initiative, 4A, needs to happen prior to this plan being approved and definitely prior to any more development. A current baseline must be established to know whether or not environmental harm is occurring or has already occurred. This Initiative seems to be "cart before the horse" approach to me. If it is believed or perceived that this Stream Survey Program needs to expand, then why would we wait to do it, based on approval or adoption of this plan by the County? It should be happening already, prior to any more changes of any kind in the Sugarloaf Planning Area or on the West side of I-270. How will you vigilantly protect in the sensitive environmental areas adjacent to the "cut-outs", from the new development areas where surface water and stormwater run-off, will mix with groundwater through the introduction of new Impervious Surfaces from development? This needs to be studied prior to this plan approval. Later is too late. What are your contingencies for negative issues as a result of more development in the "cut-outs"?
- Page 81 notes Impervious Surfaces, which are a direct, negative result of development.
  - Do I need to say more about this?

- Page 90 clearly states the current issues with the Urbana Watershed which passes through developer property at the Urbana “cut-out”. Further development of this area cannot be good for this Watershed.
- Page 89 shows and states the importance of Headwaters which feed the tributaries within the Watersheds of the Sugarloaf Plan.
  - Page 89 gives a brief description of how the disruption of these Headwaters through development can destroy exactly what the Sugarloaf Plan is trying to preserve.
- Page 97 shows the Designated Use Classes for Maryland’s Surface Waters.
  - In a minimum of at least 6 different areas on the two developer properties, there are vital Headwaters either directly on or directly adjacent to property boundaries.
    - The concern is any of the runoff from various sources of construction, road salts, chemicals and personal property owners in these developed areas using lawn care products, fertilizers, etc.
    - Testing represented in the Sugarloaf Plan has proven issues of poor quality in some of these waterways, already exists. The BIBI in the Thurston Road area is a good example of this on page 90. There’s no doubt, that development caused it, so why make it worse through more development? The further removal of trees as noted in the Plan is more detrimental to an already sensitive pair of watersheds.
- Sugarloaf Plan Policy 6.5, page 85 & 86 states there is already a concern for the North Branch and Urbana Branch Watersheds shown on map 6-5, page 86, both of which are passing through the cut-outs.
- Of high importance, extremely high importance, is the fact the Monocacy River being fed by these headwaters and tributaries, is part of the Piedmont Sole Source Aquifer within the Sugarloaf Area and the County along with both of the Bennett Watersheds, which pass through the developer’s Urbana property.
  - If these waterways are already endangered and potentially at further risk, as suggested in the Sugarloaf Plan, it makes absolutely no sense whatsoever to continue to develop to the West of I-270 and endanger these waterways further, not to mention the risk stated in the Sugarloaf Plan of the negative effects, that can affect the groundwater and existing wells currently used by the residents within the proposed preservation area.
- Note that the Aquatic Monitoring Sites on Map 6-3, page 94 shows no testing in the newly proposed development areas West of I-270. Was there testing before the line changed?
  - The extreme north portion of the North Branch watershed and the southeast border of the Urbana Branch Watershed pass directly into or through the developer properties.
- Policies and Initiatives to be addressed that will be directly affected by the developer’s two holdings West of I-270, if development occurs.
  - Policies 6.2, 6.3, 6.4, 6.5, 6.7, 6.9, 6.10, 7.2, 7.4, 7.5
  - Initiatives 4B, 6B, 6D, 6E, 7A
- Note on page 115 how the Class II – High Quality Habitat for FIDS (Forest Interior Dwelling Species) as modeled by the Maryland DNR just stops at the southern border of the developer’s Urbana cut-out. I guess the “cut-out” is not important as a High Quality Habitat for FIDS?

#### In summary:

- Just because a developer bought two properties, he believes to be the “Boardwalk & Park Place” of the Sugarloaf Planning Area, doesn’t mean he gets a green light to cause more harm than good through development on the West side of I-270. If it was good enough previously for the line to be at the I-270 border, then based on this plan, it’s good enough for the line to be there now and forever!
- The Sugarloaf Plan states over and over again the negative effects of further development in the area. If all of these listed Policies and Initiatives in this plan are so important to the preservation of the area, then the line needs to be moved back to I-270 where it was.
- If the goal of the Sugarloaf Plan is actually to preserve the waterways, habitat and environment of the proposed area, then it makes absolutely no sense whatsoever to continue to develop West of I-270.
- If the Sugarloaf Plan is sincere, then the “exceptions” afforded to the developer do not support the Sugarloaf Plan in any way, shape or form.
- These noted vital Policies and Initiatives have taken how long to put together in this plan? I’m sure those in the Planning and Permitting Division had numerous meetings all along the way to approve each of these Policies and

Initiatives for placement in the proposed Sugarloaf Plan. You would think the high importance of any of these, once realized, would have been acted on immediately, if there is a genuine belief in the harm that can come to the Sugarloaf area.

- The Policies and Initiatives to study further, the effects of further development in the developer “cut-outs”, needs to happen prior to any approval of this plan. Once this plan is approved by the County, the developer is free to do whatever he wishes, by the County granted “exceptions” he was given.
- I will make the assumption the MDOT also has an agenda for the I-270 Corridor which will feed not only the developer’s vision for his two holdings, but his bank account as well.
- Ask yourself, how many concerns have the residents in the Sugarloaf Area had in the past, that still haven’t been addressed, by either the Frederick Council or the County Council and now you want to promise it will all be taken care of or looked at via the Livable Frederick Master Plan?
- Why is the Sugarloaf Treasured Landscape Management Plan being pushed through so fast? The residents have just been recently notified and need more time to rebut this plan, especially since the County was not forthcoming in notification of the changes to the map of the Eastern border which was I-270.

#### Additional Comments:

I listened carefully on Tuesday and Thursday nights and I hear a community that is frustrated and extremely disappointed in their County Leadership, in the name of progress. In my experience, there has always been a group or individual, that believes they know what is best for everyone else. Most unfortunate is these people are usually blinded by their climb of the political ladder and/or the almighty dollar. Politics having been mentioned in the Sugarloaf Plan. If someone in the County Office wanted to thank the developer of the East side for increasing the tax base, then that’s exactly what it should have been, a “Thank you”, nothing more. Not some backdoor deal to give the developer special exceptions for more development where the residents don’t want it! And then add insult to injury by not having him abide by any of the Policies set forth in the Sugarloaf Plan, sort of like, all the rules, preservation and natural resources just stop at his property boundaries?

The current residents have been good stewards of their lands and the environment surrounding their lands, for many, many decades. We don’t accept the “Bully” nature of a billionaire developer or his “What about me?” attitude, who wants to turn portions of the West side into the Residential & Commercial Mecca that he wants to be patted on the back for creating on the East side of I-270. I say, pat him on the back and keep it on the East side!

There is no feeling more satisfying to me than the feeling I have when I turn onto Parks Mill Road coming off of MD355 and crossing over I-270 into the oasis of the Sugarloaf area. I don’t want or need to see a McDonalds, Burger King, Starbucks or any number of more than 30 other fast-food establishments in our “rushed, 90 miles an hour society of today”. I don’t need to get to our property any faster. I don’t need or want to see or pass any facades, of any kind of buildings, no matter how well designed the Plan promises them to be. They are not any part of the Rural character of the area and never could be, no matter how they may be built or what they look like, I don’t want to see them. I am perfectly happy with the way we access our property now and whole-heartedly reject any changes that would be produced by further development in the Urbana or the MD80 “cut-outs”. If I feel the need to see any of this, or would like some of the local highly-processed cuisine, I’ll take the extremely short drive into Urbana for that experience, and if I feel lazy, I’ll call “Door-Dash or Uber Eats”.

You want suggestions for improvements? Fix MD355. Widen it all the way from I-270 in Frederick to Urbana. Put in turning lanes and/or stoplights at spots like Parks Mill Road. Leave the Urbana and the MD80/Parks Mill “cut-outs” alone, to continue to flourish as the buffer between us and I-270, as originally intended by the plan. The Sugarloaf Treasured Landscape is exactly that! More development in the “cut-outs” does nothing for us, but destroy the peaceful, serene nature we’ve come to love so much. We are at the boundary of these so-called improvements now, because of the “cut-outs”. In fact, if it happens, we will be forced to consider selling our property, but don’t want to be put in this position. If development occurs, we will experience all the problems associated with development and none of the monetary advantages that will be afforded to the developer. These “cut-outs” are just the beginning of chipping away at the proposed preservation area, and the concern is that eventually all that will remain, will be the mountain itself.

Sincerely,  
James Gunsallus







## Dolan, Mary

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**From:** John Menke <john@menkescientific.com>  
**Sent:** Monday, August 30, 2021 10:54 AM  
**To:** Goodfellow, Tim  
**Cc:** Gary Magnuson  
**Subject:** Sugarloaf Draft Plan Comments

[EXTERNAL EMAIL]

Dear Mr. Goodfellow,

Below please find my comments re the Sugarloaf Draft Plan. Thank you.

John Menke  
130 E ed St  
Frederick, MD

\*\*\*\*\*

I have just completed a review of the Draft Sugarloaf Area plan from Frederick County. While I applaud the effort that has gone into it, overall, I am disappointed—primarily because the Draft falls so far short in addressing the needs of the very area of its namesake—Sugarloaf Mountain.

Others have commented on the opening of the area for development west of 270/Urbana. This is a very serious problem. Indeed, Frederick County still has no real comprehensive program to prevent piecemeal development across much of the rural parts of the county. As such, symbolic and legal “barriers” like 270 take on much more importance.

But this is far from the only or even most serious deficiency. For example

- \* The Draft discusses several possibilities for piecemeal and larger development all along the west side of Sugarloaf. However, there are few direct and strong suggestions for improving the odds of keeping the west side largely development free. What have been the past and likely future trends? How will they be resisted?
- \* The maps are extremely hard to follow, particularly if one wants to know simple things—such as where is additional development is planned to be prevented (and how). Or encouraged (to what degree).
- \* There is little discussion, much less analysis, of the governing structure of Sugarloaf. Sugarloaf and Stronghold is central to the entire plan, yet the future is largely dismissed in general terms of goals, not in particular actions to be taken. Another aspect of this is to perform an evaluation of how well Stronghold has in fact protected the Mountain, and whether the still high quality of the Mountain is in fact a lure for more intense development on its slopes.
- \* There is little discussion of the racial (esp black) history of communities in the area, and no analysis of what has happened to them. This is an important part of the heritage of the area, so solid suggestions for bringing this history into the present would be welcome.
- \* With Adamstown and Buckeystown designated as growth areas, how are these to be delimited so they don't expand further into the agricultural lands, creating ever more pressures for development across the Monocacy.
- \* Where are the views of the Stakeholder and other citizen groups that have worked on this plan? What are their views? Do they like the plan? I guess they were not important, since they are not listed in the credit pages.

\* Other than a brief mention of the Montgomery County Ag Reserve, there is little reference to Montgomery County's interest in Sugarloaf, or its many steps to preserve the agricultural area to the East of the Mountain. Where is the obvious recommendation for a detailed bi-County approach to protecting the area?

\* Given the complexity of the Draft, and the many overlapping sections, an index prepared by an expert (ie, not a simple computer driven index) would be a big help. An Executive Summary would also have been a big help in sorting through the large number of recommendations.

Finally, I would note the not insignificant point that Frederick County that has spent many hundreds of thousands of dollars on developing this Draft, but then charges some \$45 per copy for citizens who want a copy. Having the Plan available on line is nice, but to study this plan requires a real color copy. Surely a few hundred copies could and should be available to citizens at a more realistic price (ie, \$10 is enough to discourage casual taking).

## Dolan, Mary

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**From:** Planning and Zoning  
**Sent:** Wednesday, August 25, 2021 3:33 PM  
**To:** Brandt, Kimberly G.; Goodfellow, Tim  
**Subject:** FW: Land Development West Side of 270- NO!

Good afternoon!

FYI, I have sent a thank you response. :-)

Karen

Karen L. James  
Administrative Specialist  
Division of Planning & Permitting  
Frederick County Government  
30 North Market Street  
Frederick, Maryland 21701  
301-600-1138

-----Original Message-----

From: Kyla Moore <kymoore0509@gmail.com>  
Sent: Wednesday, August 25, 2021 2:55 PM  
To: sugarlofareaplan@frederickcountymd.gov; Planning and Zoning <PlanningandZoning@FrederickCountyMD.gov>  
Subject: Land Development West Side of 270- NO!

[EXTERNAL EMAIL]

>  
> To Whom It May Concern:  
>  
> I am writing with the utmost urgency to DENY the development of land west of 270!  
>  
> When I hear T. Natelli very briefly during a community zoning meeting "explaining" the need for him to weigh the importance of future economic development with the future environmental impacts, this is nothing more than a blanket statement rather than a genuinely true explanation of his need to over-develop more land in this area. Let's be transparent here, this is about money and making more of it. Period. I would much more appreciate a real answer to be able to truly understand where this decision is coming from.  
>  
> I understand I really don't need to re-state this because of how clearly obvious this is but our schools (elementary-high school) are immensely overcrowded. With the Stone Barn community not even completed, what is your solution to this problem? Add a few more portables? A new wing with a couple more classrooms? Our children's classrooms, and in turn, their education is being so negatively impacted by how large classroom sizes are, by parking and transportation issues, and even simple things such as not having enough lockers to accommodate all of our students. Of course the list can go on and on about how our kids' education is being impacted by the overabundance of people in one area with only so much space to accommodate, but I think, at least I hope, you understand the point I'm trying to make here. How

one could even consider building yet another community just based on this reason alone is ludicrous. I urge you to show that you actually care about your community.

>

> I'm also wondering what the point of zoning land agricultural is when in truth, it clearly means nothing if deals are being struck with the county to allow for more development on this supposedly zoned land. The boundaries continue to move. We live in a beautiful area that is rapidly declining in its natural beauty that most of us are extremely grateful to be a part of. But at some point, land has to be left alone. Only greed would dictate that not enough money has been made because there are still scraps of land yet left. The agricultural and environmental impacts speak volumes. Bennett Creek is at major risk with this decision. I'm not here for a wildlife, climate change, or ag lecture but what may seem like a "small plot of land" to Natelli et al absolutely contributes to the downfall of what makes this part of our world so great.

>

> I don't see who benefits except for Natelli and those making money off of him. It is time for him to move on. We do appreciate the community he has built but he's done enough here now. While I also appreciate the opportunity to have a "voice," (hopefully each and every one of these emails are being read and considered) it does nothing to convince me that decisions truly have already been made.

>

> Either way though, if this decision is truly up for debate as claimed...

> As strongly as I can, I encourage you to reconsider the new land development in the agriculturally zoned land west of 270. Please.

>

> Thank you,

> Kyla Moore

> 2353 Dixon Road

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## Dolan, Mary

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**From:** Planning Commission  
**Sent:** Wednesday, August 25, 2021 8:19 AM  
**To:** Brandt, Kimberly G.; Goodfellow, Tim  
**Subject:** FW: Comments on the Draft Sugarloaf Large Area Plan

Good morning!

FYI, I have sent a thank you response. ☺

Karen

Karen L. James  
Administrative Specialist  
Division of Planning & Permitting  
Frederick County Government  
30 North Market Street  
Frederick, Maryland 21701  
301-600-1138

**From:** Katie Lawhon <katielawhon@gmail.com>  
**Sent:** Tuesday, August 24, 2021 2:47 PM  
**To:** Gardner, Jan <JGardner@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>  
**Subject:** Comments on the Draft Sugarloaf Large Area Plan

[EXTERNAL EMAIL]

August 24, 2021

Dear Frederick County Executive, Council members and Planning Commission members:

I am writing to share my concerns about the Draft Sugarloaf Large Area Plan, also known as the Sugarloaf Treasured Landscape Management Plan. This plan is important to me and to all who love Frederick County's scenic beauty, natural resources and rural character.

I am concerned that:

- During the past several months, after planning reviews by county government and the Sugarloaf Citizen's Advisory Group, the County changed the Sugarloaf management boundary to exclude land owned by Natelli, the developer of the Villages.
- The revised proposal places the boundary at Thurston Road (not I-270), withdrawing about 500 rural acres, mostly owned by Natelli.
- The current Sugarloaf proposal does not address or protect from development the area between Route 80 and I-270, including a possible interchange at Park Mills Road. Natelli owns land along both sides of Park Mills Road between Route 80 and I-270.

**Escalating impacts of Climate Change makes these decisions critically important.** The draft plan identifies climate change as an important concern, stating: "Among the most impactful changes as a result of our

changing climate are: increased storm intensity and frequency, flooding and associated stream erosion, heat waves, urban heat island effects, droughts, species loss, and habitat alterations.”

The Natelli exclusion leaves 300 acres or more very likely to be as densely developed as Urbana. And since these particular Natelli-owned parcels lie in higher elevations, the environmental impacts will be magnified, increasing the intensity of stream erosion, runoff and storm impacts to other areas within the fragile lower Monocacy Watershed.

I am asking you to revise the plan to preserve and protect the areas west of I-270 that were recently cut from the planning area. For the long term, please ensure that new development in the Sugarloaf Planning Area is of a scale that doesn't excessively burden the transportation network and adversely impact natural resources, or overwhelm the rural nature of the planning area. Please do your best for the preservation of Frederick County, Maryland. I appreciate your consideration.

Sincerely,

/signed/

Catherine (Katie) Lawhon  
242 Dill Avenue  
Frederick, Maryland 21701

## **Dolan, Mary**

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**From:** Planning Commission  
**Sent:** Thursday, August 19, 2021 12:20 PM  
**To:** Brandt, Kimberly G.; Goodfellow, Tim  
**Subject:** FW: Hold the Line at I-270

Sharing, not sending a response. This e-mail is a follow up comment.

Karen

**From:** Anne Garrett <[ankath@msn.com](mailto:ankath@msn.com)>  
**Sent:** Wednesday, August 18, 2021 4:01 PM  
**To:** Planning Commission <[PlanningCommission@FrederickCountyMD.gov](mailto:PlanningCommission@FrederickCountyMD.gov)>  
**Subject:** RE: Hold the Line at I-270

**[EXTERNAL EMAIL]**

Thank you! I would also like to express my thanks to the staff of the Livable Frederick Planning and Design Office—Kimberly G. Brandt, Tim Goodfellow, Denis Superczynski, and John Dimitriou—for their time, attentiveness, and patience during the public hearing on August 17. I listened for the full 2 hours and I appreciated the opportunity to hear concerned citizens speak their minds.

Sincerely,  
Anne Garrett  
Frederick, MD

**From:** Planning Commission <[PlanningCommission@FrederickCountyMD.gov](mailto:PlanningCommission@FrederickCountyMD.gov)>  
**Sent:** Wednesday, August 18, 2021 7:53 AM  
**To:** Anne Garrett <[ankath@msn.com](mailto:ankath@msn.com)>  
**Subject:** RE: Hold the Line at I-270

Good morning.

Thank you for taking the time to express your thoughts on the Sugarloaf Treasured Landscape Management Plan.

Your comments will be shared with the Planning Commission for their consideration.

Karen L. James  
Administrative Specialist  
Division of Planning & Permitting  
Frederick County Government  
30 North Market Street  
Frederick, Maryland 21701  
301-600-1138

**From:** Anne Garrett <[ankath@msn.com](mailto:ankath@msn.com)>  
**Sent:** Tuesday, August 17, 2021 4:38 PM

**To:** Gardner, Jan <[JGardner@FrederickCountyMD.gov](mailto:JGardner@FrederickCountyMD.gov)>; Sugarloaf Area Plan  
<[SugarloafAreaPlan@FrederickCountyMD.gov](mailto:SugarloafAreaPlan@FrederickCountyMD.gov)>; Council Members <[CouncilMembers@FrederickCountyMD.gov](mailto:CouncilMembers@FrederickCountyMD.gov)>;  
Planning Commission <[PlanningCommission@FrederickCountyMD.gov](mailto:PlanningCommission@FrederickCountyMD.gov)>  
**Subject:** Hold the Line at I-270

[EXTERNAL EMAIL]

I am writing to oppose the recent proposed change of removing 500 acres from the **Sugarloaf Treasured Landscape Management Plan**. The County changed the Sugarloaf management boundary to exclude that acreage, most of which is owned by the developer Tom Natelli. His development of that land would be the exact opposite of the intent of the Sugarloaf Treasured Landscape Management Plan. Money in Natelli's pockets should not be treasured more than the beauty of that rural section of our county.

I have friends who live on Fingerboard Road and am always amazed at how soothing our visits to them are. Instead of traffic noise, I hear the lovely "noise" of nature, with bird, frogs, cicadas, and squirrels making up the chorus. To ruin that area with another blight like the Villages of Urbana would be an anathema to everyone who worked so hard on the Sugarloaf Treasured Landscape Management Plan and the rural population it is designed to cherish and protect.

Please hold the line at I-270!

Sincerely,

Anne Garrett  
Frederick, MD



**Dolan, Mary**

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**From:** Matt Seubert <matts853@gmail.com>  
**Sent:** Thursday, August 19, 2021 2:30 PM  
**To:** Brandt, Kimberly G.; Superczynski, Denis; Dimitriou, John; Goodfellow, Tim; Planning Commission; Council Members; Gardner, Jan  
**Subject:** Change to Sugarloaf Treasured Landscape Management Plan

[EXTERNAL EMAIL]

Dear members of County Planning Staff, Planning Commission, County Council, and CE Gardner:

I'm writing to all of you at once because I figured I'd cover all the bases with my questions and comments on the subject.

I'm very unsettled by the inherent lack of transparency that occurred during the months long delay preceding the release of the Draft Sugarloaf Plan.

The following questions are probably most appropriate for Staff to answer: During this delay did any members of the Stakeholders' Advisory Group participate in the decision to remove the Natelli Properties from the Planning Area and strip it of the Rural Heritage Overlay? If not, were any members aware that this change would be included in the Draft?

These are simple yes or no questions of which I've asked 3 council members and 1 member of the Advisory Group, none of whom have given me straight answers to. Why all the obfuscation? Anecdotally, I've heard that at least 3 members of the Advisory Group were caught completely off-guard by this change, and they aren't happy about it.

So, my gut tells me the answers are no to both questions. Which can only mean 1 thing: During the delay, Mr. Natelli asked someone(s) high up in the County to make this change behind closed doors, thus taking the decision out of the hands of the Advisory Group and circumventing what had been a very public and transparent process.

Moreover, this change is large in significance but seemingly small in process: It's a minor change to the maps and only a page or so of text. This could have been done in a matter of a few weeks or less, so why did it take nearly 5 months?

Meeting minutes are a minimum standard of transparency for Advisory groups, but I can't find them anywhere on the County website for any of the meetings. If any minutes or other notes/summaries from the meetings do exist, I would very much appreciate a copy of them. I'm especially interested in what happened at the meetings that took place on July 27 and July 28.

If we truly value transparency in government, then the ultimate determination of the Draft Planning Area should have been left to the Advisory Group. The decision to alter the Draft is better left to the Planning Commission and the County Council. As it stands now, it's advantage developer and that's not right.

That's it for now on the process. I will be sending you another email stating my objections to excluding the Natelli properties from the Planning Area.

Thank you.

Sincerely,

Matt Seubert  
Urbana

Sent from my iPad

**Dolan, Mary**

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**From:** Planning Commission  
**Sent:** Monday, August 30, 2021 11:26 AM  
**To:** Brandt, Kimberly G.; Goodfellow, Tim  
**Subject:** FW: Tired of developers governing Frederick County's future

Good morning!

FYI, I have sent a thank you response. ☺

Karen

Karen L. James  
Administrative Specialist  
Division of Planning & Permitting  
Frederick County Government  
30 North Market Street  
Frederick, Maryland 21701  
301-600-1138

**From:** Joanne Horn <jhornbioservices@gmail.com>  
**Sent:** Friday, August 27, 2021 4:04 PM  
**To:** Gardner, Jan <JGardner@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>  
**Subject:** Tired of developers governing Frederick County's future

[EXTERNAL EMAIL]

Dear County Executive, County Council and Planning Commission Members,  
I am one of the many County residents/business owners very disturbed over the recent unveiling of what seems a capricious and unwise decision to expand Urbana development West of Rt 270. Noone wants to see a precious part of our rural areas become "Urbanized" and progress further on a path to Frederick becoming "Montgomerized." If I wanted to live in Montgomery County I would have moved (and worked) there among the sprawl, traffic, pavement and strip malls; but I appreciate our proximity to open, natural spaces and agricultural lands. It further seems the changes to existing plans occurred without consultation or advice from the community at large, seemingly behind closed doors, which is alarming. This is a disturbing development which only seems to further indicate the degree to which housing developers are driving the future of our County. And judging from the types of housing that is being developed across the County, there does not seem to be any innovation or thought regarding resources, climate change, or strategic land use; its all about sterile/static 1950s-style housing projects that don't fit with 21st Century needs or liveable communities. This needs to stop, and this development is where we need to hold the line.

Respectfully,  
Joanne Horn

--  
*Joanne Horn, Ph.D.*

**J. Horn Bioservices LLC**  
**mobile:240-578-0996**

## **Dolan, Mary**

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**From:** Planning Commission  
**Sent:** Wednesday, August 18, 2021 3:55 PM  
**To:** Brandt, Kimberly G.; Goodfellow, Tim  
**Subject:** FW: Please continue to protect Sugarloaf Rural Heritage Overlay Zoning District

FYI. I am sending a thank you response. ☺

Karen  
Karen L. James  
Administrative Specialist  
Division of Planning & Permitting  
Frederick County Government  
30 North Market Street  
Frederick, Maryland 21701  
301-600-1138

**From:** David Hunter <davidhunter@bym-rsf.org>  
**Sent:** Wednesday, August 18, 2021 3:43 PM  
**To:** Planning Commission <PlanningCommission@FrederickCountyMD.gov>  
**Subject:** Please continue to protect Sugarloaf Rural Heritage Overlay Zoning District

[EXTERNAL EMAIL]

Dear Frederick County Planning Commission Members,

I'm writing to share my concerns about the changes to the Sugarloaf Treasured Landscape Management Plan. I do not believe that the approximately 500 acres West and South of Interstate 270 at the interchange with Route 80/Fingerboard Road should be removed from the Sugarloaf Rural Heritage Overlay Zoning District. "West of I270" has served as a clear and easily understandable eastern border for the area for many years now. I see no reason change that border just because developers acquired property in that area. Conservation zoning areas are designed to help to protect land from such people and should not be abandoned merely to suit the desires of individual interests. Let us continue to protect this unique geological and scenic area for generations to come.

Peace to you all,

David Hunter



## Dolan, Mary

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**From:** Planning Commission  
**Sent:** Tuesday, August 17, 2021 10:00 AM  
**To:** Brandt, Kimberly G.; Goodfellow, Tim  
**Subject:** FW: Sugarloaf Area Plan

**From:** careymurphy@aol.com <careymurphy@aol.com>  
**Sent:** Tuesday, August 17, 2021 8:18 AM  
**To:** Planning Commission <PlanningCommission@FrederickCountyMD.gov>  
**Subject:** Sugarloaf Area Plan

[EXTERNAL EMAIL]

Frederick County Planning Commission Members:

Thank you for your service to our county.

As both an environmental and traffic safety advocate for the Greater Urbana Area, I am writing to express my concern over the potential for more development along Fingerboard Road in the Urbana region. I am speaking of the 500 acre parcel that was recently eliminated from the area to be conserved as part of the Sugarloaf Large Area Plan.

I'm going to keep this brief, because I think the matter is simple.

- We cannot afford to lose any more trees, especially those in older growth forests. Saving our trees is an important part of managing climate change, stormwater pollution, air quality and so on. They also provide habitat for the biodiversity that we as humans cannot survive without.
- We cannot afford more traffic in this area. Every day we have more accidents and near misses on roads that were meant to be rural. The amount of traffic and accidents on 355 North of Urbana and on the feeder roads such as Park Mills Road and Tabler Road have greatly increased because of all the development in the area. It is my understanding from speaking with MD SHA that there are no future improvements planned for any of these roads, despite the increasing homes.
- We need to stick to our heritage. Let's keep the Sugarloaf Area as is and prohibit any further development on the west/south side of 270. So much of our culture in Frederick County is reflected in the agricultural and forested character that comprises the Sugarloaf Region. If we don't have a line to stop somewhere, then we will likely stop nowhere.
- Please honor transparency and engage with the citizens of the county and respect their feedback/concerns/commitments.

In conclusion, I am asking that the 500 acre parcel of land along Fingerboard Road be added back in the planning area and conservation district.

I am a 20+ year resident of the Villages of Urbana and a 35+ year resident of Frederick County.

Thank you for your consideration.

Carey Murphy  
9125 Bealls Farm Road

Frederick, MD 21704



## Dolan, Mary

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**From:** Planning Commission  
**Sent:** Wednesday, August 18, 2021 7:51 AM  
**To:** Brandt, Kimberly G.; Goodfellow, Tim  
**Subject:** FW: Hold the Line at I-270

FYI. I am sending a thank you response. ☺

Karen  
Karen L. James  
Administrative Specialist  
Division of Planning & Permitting  
Frederick County Government  
30 North Market Street  
Frederick, Maryland 21701  
301-600-1138

**From:** Anne Garrett <ankath@msn.com>  
**Sent:** Tuesday, August 17, 2021 4:38 PM  
**To:** Gardner, Jan <JGardner@FrederickCountyMD.gov>; Sugarloaf Area Plan <SugarloafAreaPlan@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>  
**Subject:** Hold the Line at I-270

[EXTERNAL EMAIL]

I am writing to oppose the recent proposed change of removing 500 acres from the **Sugarloaf Treasured Landscape Management Plan**. The County changed the Sugarloaf management boundary to exclude that acreage, most of which is owned by the developer Tom Natelli. His development of that land would be the exact opposite of the intent of the Sugarloaf Treasured Landscape Management Plan. Money in Natelli's pockets should not be treasured more than the beauty of that rural section of our county.

I have friends who live on Fingerboard Road and am always amazed at how soothing our visits to them are. Instead of traffic noise, I hear the lovely "noise" of nature, with bird, frogs, cicadas, and squirrels making up the chorus. To ruin that area with another blight like the Villages of Urbana would be an anathema to everyone who worked so hard on the Sugarloaf Treasured Landscape Management Plan and the rural population it is designed to cherish and protect.

Please hold the line at I-270!

Sincerely,

Anne Garrett  
Frederick, MD



## Dolan, Mary

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**From:** Planning Commission  
**Sent:** Wednesday, August 18, 2021 7:46 AM  
**To:** Brandt, Kimberly G.; Goodfellow, Tim  
**Subject:** FW: Sugarloaf Area Plan

FYI. I am sending a thank you response. ☺

Karen  
Karen L. James  
Administrative Specialist  
Division of Planning & Permitting  
Frederick County Government  
30 North Market Street  
Frederick, Maryland 21701  
301-600-1138

**From:** Karen Russell <1ceramicat@comcast.net>  
**Sent:** Tuesday, August 17, 2021 4:21 PM  
**To:** Gardner, Jan <JGardner@FrederickCountyMD.gov>  
**Cc:** Council Members <CouncilMembers@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>  
**Subject:** Sugarloaf Area Plan

[EXTERNAL EMAIL]

Dear County Executive Gardner:

Regarding the Sugarloaf Plan draft, I have learned from Kai that it appears you delayed its release, in order to work out a deal with developer Natelli for a data center on about 500 acres of forest and farmland that he largely owns in the Sugarloaf Planning area next to I-270 and that your office then edited the draft so that it appears the area was never part of the Plan. I have also learned that the Sugarloaf Citizen's Advisory Group was blindsided by this change.

One of the waterways that appears to border the carved-out site is Bennett Creek. According to *An Assessment of Stormwater Management Retrofit and Stream Restoration Opportunities in Bennett Creek Watershed, Frederick County, Maryland*, "Valuable aquatic resources are located within the Bennett Creek watershed. This includes Bear Branch, the only pristine brook trout-bearing stream in all of Lower Monocacy River Watershed (p. 1)." Culturally, we have developed land without thought as to how that development affects the natural world. The result is fragmented habitat, which isolates animals and plants, limiting the gene pool and negatively affecting reproduction. This reduces biodiversity, which is now recognized as critical to human survival and which is rapidly declining globally. Uncontrolled development also results in degraded water sources.

Frederick County is valued for its natural areas. Land use decisions are made at the local level. We need to protect the Sugarloaf area, in its entirety. I ask you to return the area to its prior borders.

Thank you,

Ms. Karen Russell  
510 E. Mountain Rd.  
Knoxville, MD 21758  
301-401-2463

## Dolan, Mary

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**From:** Dimitriou, John  
**Sent:** Tuesday, August 17, 2021 2:19 PM  
**To:** Goodfellow, Tim; Brandt, Kimberly G.; Superczynski, Denis  
**Subject:** FW: New voicemail for The Sugarloaf Area Plan

FYI

*Thanks,*

**John Dimitriou, RA**  
Livable Frederick Design Planner  
[jdimitriou@frederickcountymd.gov](mailto:jdimitriou@frederickcountymd.gov)  
(301) 600-1150

**From:** PublicInput.com Phone System <A8632@publicinput.com>  
**Sent:** Tuesday, August 17, 2021 2:18 PM  
**To:** Dimitriou, John <JDimitriou@FrederickCountyMD.gov>  
**Subject:** New voicemail for The Sugarloaf Area Plan

[EXTERNAL EMAIL]

A new voicemail was received for "*The Sugarloaf Area Plan*".  
This voicemail can be reviewed [here](#).  
To: +18559252801  
From: +13016936659

Message Transcription: This is Barbara Lucksinger speaking for my husband, Peter Lucksinger, and me as long-time residents of thirt and road on our tree farm. We strenuously object to the last minute carve out of the boundary area on the west side of 2 74, a local developer who was responsible for this carve out. Anyway, the entire west side of two 70 must be conserved and preserved to protect the natural resources of the entire area. As detailed in the Sugarloaf treasury management plan, we have all witnessed that one breach of such plan B gets more breaches, which must not have.

### Audio File

You can change or disable notifications like these on the [project settings tab](#).



## Dolan, Mary

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**From:** Nick Carrera <mjcarrera@comcast.net>  
**Sent:** Tuesday, August 17, 2021 12:36 PM  
**To:** Sugarloaf Area Plan  
**Cc:** Carrera, Nicholas; Stoner, Karla & Bill; Carrera, Alexandra; Edelen, Wayne; Baker, Karen & Chad; Novotny, Leslie & Greg; Simpson, Margy; Hartlaub, Martha; Poteat, Steve & Blanca; Carrera, Johnny; Kimble, Lori; Becker, Francis; Poteat, Steve & Blanca  
**Subject:** Scenic Roads -- Proposing Thurston Road for inclusion

[EXTERNAL EMAIL]

To the Planning Commission,

This comment is too detailed to give over the phone tonight, so here it is in full; I may still call and simply propose Thurston Road's inclusion, without all this supporting detail. Also note the correction for "compliment." No sense getting down into the weeds in a phone call.

Here's my comment:

In the "Scenic Roads" section beginning on page 68, Sugarloaf Mountain Road and Peters Road are cited as being in the county's Rural Roads program. On page 72, Slate Quarry Road, Dixon Road, and Dr. Perry Road are recommended for a new, "Scenic Road" designation. All five of these scenic roads are linked by Thurston Road, itself a lovely and scenic road. Thurston Road, at its northern end, affords an open, distant view of Sugarloaf Mountain; near its southern end it narrows and enters Montgomery County's Agricultural Reserve. In between it has curves and hills, crosses Little Bennett Creek, and passes horse farms, cultivated fields, wooded areas, and historic buildings.\* It appears to meet the criteria listed on pages 68 and 72; I propose that Thurston Road be recommended for "Scenic Road" designation.

\*These historic entries are listed in the Appendix as located on Thurston Road: NR 00001053 (also appears as F-7-18), F-7-11, F-7-69, F-7-72, F-7-74, F-7-81, F-7-82, F-7-109, U-78, U79 & U-80, U-98, and U-103. Maybe Thurston deserves its own designation as a "historic entity."

*By the way, in the text of Initiative 5D on page 72, "compliment" should read "complement."*

With my sincere regards and thanks for the many wonderful parts of the Draft Plan,

Nick Carrera, Urbana District.

P.S. I just happen to live on Thurston Rd, in the "historic resource" that you list first in the Appendix (NR 00001053). Yes, Roger Johnson called it "Bloomsbury," but my parents-in-law called it "Wellcome Farms," doubling the el as a nod to the LL initials of my father-in-law, Leon Loeb. I retain that name because it's "family." It also avoids possible confusion with "Bloomsbury Forge," listed as resource F-7-23, owned by Bill and Karla Stoner just down the road from me. It's now a horse-boarding farm and they keep it in beautiful shape. It always gives me a special lift on my morning walks down Peters Road.





## **Dolan, Mary**

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**From:** Nick Carrera <mjcarrera@comcast.net>  
**Sent:** Saturday, August 14, 2021 3:08 PM  
**To:** Sugarloaf Area Plan; Goodfellow, Tim  
**Cc:** Gardner, Jan; Council Members; Carrera, Nicholas  
**Subject:** Questions regarding the Urbana CGA in the current Draft Sugarloaf Plan

[EXTERNAL EMAIL]

Dear Planning Commission members,

I look forward to the upcoming virtual Open Houses. I have questions on the Urbana CGA that I'm asking in advance, since there's some explanation involved in my posing them. Seeing questions in advance also gives you opportunity to better prepare your answers.

On page 42 of the current Draft Sugarloaf Plan, the idea of an Urbana "Community Growth Area," is presented. I don't recall reading of such a concept before. Nevertheless, the opening words of this section, "For nearly 50 years," hint that the County has "always" had such a concept in mind. So I re-read the Preliminary Plan that was presented in the Briefing Book for the Sugarloaf Plan, made publicly available in early 2020. That Preliminary Plan recalls, in its "Area Planning History" Section, the 1959 Land Use Plan (p. 13), the 1972 Comprehensive Plan (p. 14), the 1978 Urbana Region Plan (p. 15), the 1984 Urbana Region Plan (p. 16), and the 2012 County Comprehensive Plan (p. 17). None of these prior Plans, as described in the Briefing Book, includes the idea of a Community Growth Area (CGA), for Urbana or anywhere else.

### **That prompts these questions:**

-- Why does the Current Draft Plan not include at least a bare mention of these earlier studies that included no CGA?

-- The Preliminary Plan in the 2020 Briefing Book also had no Urbana CGA, and it protected the Sugarloaf Area all the way east to I-270. Why was this changed? Whose idea was it?

### **The Urbana CGA is discussed in terms of a "finite geographical area, " and "compact, transit-oriented villages."**

-- Can the Draft Plan provide more detail? Is "finite" considered to be consistent with the planned sprawl north to Park Mills (and will it end even there)? Is "finite" also considered consistent with Urbana's sprawl to the east, which appears at present to be limited only by how fast the state can widen Rte 80 to four lanes?

-- Is "transit-oriented villages" considered to be what we have now, which is simply commuter parking and commuter buses available? We also have heavy traffic by private automobile, often spilling onto Thurston Rd by motorists seeking to avoid I-270 backups. To me, that doesn't spell a CGA that is "transit-oriented."

### **The current Draft Plan speaks of extending the Urbana CGA to the west of I-270.**

-- What would "finite" and "compact, transit-oriented villages" mean for an Urbana CGA west of I-270? Once I-270 is breached, what is to limit its spread farther into the area west of I-270, the very region that is supposed to be protected under the Sugarloaf Plan?

I know these are many questions I'm raising. But the way the current Draft Plan has introduced the new idea of an Urbana CGA, particularly with the idea of extending it west of I-270, introduces a sharp departure from county plans we have seen in the past. In particular, it is a sharp break from the 2020 Briefing Book that we expected to be respected in preparing the Sugarloaf Plan. This action has raised many questions that need to be answered.

Thank you for considering my questions. I'll be listening this coming week for your presentation and the discussion.

Nick Carrera, Urbana District

## Dolan, Mary

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**From:** Nick Carrera <mjcarrera@comcast.net>  
**Sent:** Saturday, August 14, 2021 8:47 PM  
**To:** Sugarloaf Area Plan; Goodfellow, Tim  
**Cc:** Gardner, Jan; Council Members; Carrera, Nicholas  
**Subject:** Corrected question and additional questions

[EXTERNAL EMAIL]

Dear Planning Commissioners,

I'd skipped the Appendix in my first reading, and didn't see that you *did* include brief descriptions of the the previous development plans, from 1959 to 2012. So please ignore the first question in the email I sent earlier today, asking why they were not included in the current Draft Plan.

Now a few more questions/comments:

-- Page 64 notes that most accidents in the Planning Area occur on Thurston Road and Park Mills Road. It should be obvious that excluding the developer's property between Thurston Road and I-270, as the current draft Plan does, will allow the possibility of its development. Such development -- no matter for what purpose - - can only add to the traffic load on Thurston Road, and perhaps Park Mills as well. The Plan, in demonstrating complete honesty and openness, should note not only the exclusion of the developer's property in the current Plan, but should also note the downsides of that exclusion, such as this increase in traffic and accidents.

-- On page 68, the paragraph at top of page indirectly opens the issue of rezoning the developer-owned property now excluded from the draft Sugarloaf protected area. Worse, it goes beyond, and appears to signal that a request for rezoning will be favorably considered. This was already foreshadowed by the discussion on pages 42-43, concerning extending the Urbana Community Growth Area to the west of I-270. I regard this apparent "invitation" to the developer to request rezoning change as irregular and perhaps unethical.

-- On the issue of "Scenic Roads," beginning page 68, it appears that views of Sugarloaf Mountain are highly valued. See the last bullet on page 68 and the "scenic characteristics" that are cited for Dixon Road and for Doctor Perry Road on page 72. I draw your attention to another lovely and dramatic view of Sugarloaf Mountain. After exiting I-270, going a short distance west on Fingerboard, then bearing left at the sign for Thurston Rd, you come to the stop sign at the north end of Thurston Road. The driver, having stopped and looking straight ahead, has a dramatic view, gazing across an open field at Sugarloaf Mountain in the distance. As it happens, as best I can tell from the boundary map in the revised Plan, that field will be excluded from the Sugarloaf Plan and thus lies at risk of development. To spoil this view, so peaceful and inviting, would be a great pity, and one more failure of the current Plan to protect Sugarloaf Mountain. If it were up to me, I'd re-include the developer's property in the Sugarloaf protected area and designate Thurston a "scenic road."

-- And on the subject of views, I note that there are many lovely pictures included in the draft Plan, but for some the location is provided, for others it is not. I'd like to see all the pictures identified as to location.

Lest you think my comments all negative, I think overall the draft Plan is very well done, and raises a myriad of important considerations I might not have thought about. The pandemic, though, has not been kind to the process. Changes from the Preliminary Draft, such as I have drawn to your attention in my questions, might not

have been made had there been opportunity for public discussion and bottom-up input from the Advisory Group to the Planning Commission. Changes have been imposed from above, I gather, and they reflect badly on the process of this very important issue for the county and for the entire Washington metropolitan region.

Nick Carrera, Urbana District

**Dolan, Mary**

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**From:** Nick Carrera <mjcarrera@comcast.net>  
**Sent:** Sunday, August 15, 2021 5:29 AM  
**To:** Sugarloaf Area Plan; Goodfellow, Tim  
**Cc:** Gardner, Jan; Council Members; Carrera, Nicholas  
**Subject:** Need Map of the area excluded under current Sugarloaf Plan

[EXTERNAL EMAIL]

Planning Commission,

A focus of the discussion of the current Sugarloaf Plan is and will continue to be the portion that was excluded from the Sugarloaf overlay that was proposed in the Preliminary Plan of 2020. That is the cutout that lies roughly between Thurston Road and I-270.

It would be good for us all to be singing from the same sheet of music on this issue. Can you provide a large-scale map of that cutout, showing, in print large enough for this octogenarian to read, ownership, acreage, and current zoning? I think such information is needed, to get our facts straight. I know already I may have wrongly portrayed that cutout, terming it a "350-acre Natelli exclusion." It appears, though, to be something like 490 acres, and comprising Natelli's and other holdings. I'd like to get it right.

Thanks for your help.

Nick Carrera, Urbana District



## Dolan, Mary

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**From:** Planning Commission  
**Sent:** Monday, August 16, 2021 2:41 PM  
**To:** Brandt, Kimberly G.; Goodfellow, Tim  
**Subject:** FW: Say No to Overlay

**From:** Sasha Carrera <sasha.carrera@gmail.com>  
**Sent:** Monday, August 16, 2021 2:31 PM  
**To:** Planning Commission <PlanningCommission@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>  
**Cc:** Gardner, Jan <JGardner@FrederickCountyMD.gov>  
**Subject:** Say No to Overlay

[EXTERNAL EMAIL]

Dear Tim Goodfellow,

Congratulations to you and all who participated in the Livable Frederick design. The Treasured Sugarloaf Area does so much to ensure the longevity and tranquility of this precious part of the county. As scientists are discovering more and more, nature is essential to our emotional, cognitive and physical wellbeing and access to it is crucial in our area of disappearing farm lands and increased development so I am very gratified to see our city planners recognizing and honoring this need.

However, I am extremely concerned about the overlay that lops off nearly 500 acres on the west side of 270 -- land that has always been set aside as protected and zoned agricultural. It's simple to see why keeping it that way is crucial to protecting, honoring and conserving this area because this set aside undermines so much of what the plan has beautifully put in place.

First of all, it opens up questions of zoning to begin with. If one developer can develop here, why can't others? There are already rumors of speculators who have purchased homes along Thurston Road in hopes of someday developing them. Once they see someone else has been granted an exception, what's to stop them from clamoring for their own? And what's to stop Frederick County from granting it? I-270 presents the natural border between commercial and agricultural. You start to mess with that and you are basically laying out the red carpet for developers to come on in, challenge the zoning, and ruin this "treasured" land.

Secondly, it undermines the beautiful rustic roads designations suggested for Dixon, Dr. Perry and Slate Quarry Roads. If you allow development that spills onto Fingerboard and Thurston Roads, you can't expect that to not spill onto the roads that open onto them. Thurston Road already had one of the highest accident incidents 10 years ago -- I'm sure it's higher now. You really want to add to that and multiply it by encouraging more people to use their apps to "beat traffic" by taking short cuts down these narrow, windy rustic roads? Have you seen what's happened to Ed McClain Road? That's just a fraction of what would happen here.

And while we are on the topic of traffic -- it's a given if there's more traffic on Thurston, widening the road would be the next step. Have you seen the work on Fingerboard east of 270? People's front yards are being demolished to make a four lane road because of poor placement of Urbana Middle and High Schools across

Rte. 80 from the Villages. I'm sure those property owners are plenty angry – I imagine most of them will sell out to more development and move where they can enjoy the peace they've been paying property taxes on for years. Is that really what you want to happen on the west side as well?

Lastly, we love our area but we are not the only ones who use it. Bicyclists, horseback riders, day trippers from all over the DMV come to Sugarloaf. The Washington Post even picked up an editorial because it's of interest to the entire region. You imperil bicyclists, horseback riders, walkers, anyone coming to our area seeking to experience a gorgeous piece of countryside in a region that's quickly losing what makes it so precious to all of us. There are three designated Treasured Areas in the entire county – why would you shrink any of them? And if you'd undermine this one, what's to stop you from undermining the others? It makes me wonder how much you actually believe this region is "treasured" if you are so willing to sell it out.

Sincerely,  
Alexandra Carrera, Sugarloaf Alliance

*Be gentle, breathe deep, drink a glass of water.*

*Thespian* Season 1 & 2

US - <https://www.amazon.com/dp/B07KCR6FRK>

UK- <https://www.amazon.co.uk/dp/B07KCNZKSN>

[imdb.me/sashacarrera](https://www.imdb.me/sashacarrera)



## Dolan, Mary

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**From:** Brandt, Kimberly G.  
**Sent:** Monday, August 16, 2021 10:56 AM  
**To:** Goodfellow, Tim  
**Subject:** FW: Thurston Rd

**From:** Wilkins, Michael <MWilkins@FrederickCountyMD.gov>  
**Sent:** Monday, August 16, 2021 7:33 AM  
**To:** Horn, Steve <SHorn@FrederickCountyMD.gov>; Brandt, Kimberly G. <KGBrandt@FrederickCountyMD.gov>  
**Subject:** FW: Thurston Rd

FYI

**From:** James, Karen <KJames@FrederickCountyMD.gov>  
**Sent:** Monday, August 16, 2021 7:32 AM  
**To:** Wilkins, Michael <MWilkins@FrederickCountyMD.gov>  
**Subject:** FW: Thurston Rd

FYI in Planning Commission account.

**From:** [siejohunt@aol.com](mailto:siejohunt@aol.com) <[siejohunt@aol.com](mailto:siejohunt@aol.com)>  
**Sent:** Sunday, August 15, 2021 4:12 PM  
**To:** Planning Commission <[PlanningCommission@FrederickCountyMD.gov](mailto:PlanningCommission@FrederickCountyMD.gov)>  
**Subject:** Thurston Rd

[EXTERNAL EMAIL]

Hello,

Please see the email I sent to Jan Gardner and the Council Members - I would appreciate a response from you. Thank you.

Leslie Novotny

Hello County Council Members,

I sent this email to Jan Gardner. I would appreciate hearing any comments you may have to my email to her. Thank you for your time.

Leslie Novotny

Hello Ms. Gardner,

I hope this email finds you well. I have a concern about potential development on Thurston Rd. I live at 2323 Thurston Rd, Frederick, MD 21704. I have heard a piece of property (350 acres) owned by Natelli has been left out of the Livable Frederick plan. I thought the Livable Frederick plan was to keep the west side of 270 more protected by development.

Thurston Road cannot support more traffic. On days when 270 is backed up Thurston Road becomes a freeway. Cars are speeding down the road at 60 plus mph. There is a straightaway in front of my house and cars pass on a double yellow. My daughter, on a weekday morning, pulled out of our driveway. She looked both ways, nothing was coming. A car came speeding down the road, passed her and the driver gave her the finger. If a new development is built on Thurston Road...I am very afraid of what it will do to this area. It is already dangerous and adding hundreds, maybe thousands of additional cars to this road seems treacherous.

How did this piece of property which initially was included in the plan get omitted? Who gave the green light for that to happen? The meeting at UHS two years ago had a traffic map that was 10 years old. I continue to call the police department (Traffic Division) Frederick County. I have given them permission to sit in my driveway and pull people over. I can't tell you how many tickets they could write.

Please help me understand. The Livable Frederick Plan has been fantastic up to this point trying to protect a part of Frederick County that has so much to offer the people of not only Frederick County but surrounding areas. The Stronghold - Sugarloaf Mountain, bicycle clubs, horse clubs. All the natural resources.

Natelli does not care about our county, only the money he can make. There is no infrastructure to support all the building that is going on in Urbana. How can they keep building when the roads/schools can't support it.

I look forward to hearing back from you.

Thank you for your time.

Leslie Novotny  
301-351-7281

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## Dolan, Mary

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**From:** Nick Carrera <mjcarrera@comcast.net>  
**Sent:** Thursday, August 5, 2021 9:56 PM  
**To:** Gardner, Jan; Council Members; Nusbaum, Margaret; Horn, Steve  
**Cc:** Brown, Tina; Carrera, Johnny; Kaplan, Doug and Peggy; Hartlaub, Martha; Carrera, Alexandra; Peake, Chuck & Jonnie; Kelley, Ridge; Stoner, Karla & Bill; Kaplan, Peggy; Goodfellow, Tim; Poteat, Steve & Blanca; Superczynski, Denis; Winkler, George  
**Subject:** Re: We're about to give Frederick County government a black eye!

[EXTERNAL EMAIL]

Dear Jan,

One other thing I meant to tell you about. Did you know that recently Natelli's men have been out there on that property of his? I know this from neighbors who abut the property. They think the Natellis have been perking, and they know they razed an old house that had been there. I myself have seen survey crews working along the portion of Thurston Road to the north of Dixon Road. Why this recent activity? Has Natelli been assured that he'll get his way? Who gave such assurance? If all this is news to you, then someone isn't keeping you in the loop. If you knew about it, please explain what's going on there and why, if the final boundaries of the Treasured Sugarloaf area are really still under consideration.

And perhaps a whimsical question: what did Natelli intend to do with the sewer line that he ran to his property some years back? I understand it to be zoned agricultural or conservation. How did he manage to get a permit to run a sewer line to it? It's like someone had already greased the skids for him to apply in future for zoning change so he can make use of that sewer line. This does not give me a good feeling for the fairness of what is now happening.

Best regards,

Nick Carrera

On 8/5/2021 9:02 PM, Nick Carrera wrote:

Dear Jan,

Thanks for your reply, but I'm afraid I didn't make myself clear. What I was trying to say is that IF this goes through with the Natelli property exclusion it will look like the county government has caved. My point, if I can make it more directly, is that we currently have a good government that is seen as a break from the *past* one, which *was* in thrall to the developers. I don't want something to happen now that will open the door to having that ugly charge leveled at our current executive and council. And as I hope I made clear, it will be obvious to anyone that the original boundary was along I270, but a change was made that clearly benefits Natelli and therefore will carry a strong whiff of favoritism. "Why the change?" will be asked, by me and many others, and I haven't yet seen any persuasive answers. Did Natelli ask for it? was it someone else in his organization? who authorized the change? I think your administration will

get such questions, and its good standing will depend on whether honest and plausible answers are provided.

To be blunt, I think our county risks giving itself a black eye over this issue. That would be unfortunate, because I quite agree with you that we have had good government under your administration and I congratulate you and the council. And Heaven knows I appreciate that you and they put in long hours on behalf of the county. But you know how fickle people can be. Appearing now to give in to Natelli and the development side would leave our county government, as its current term draws to a close, looking tarnished. You don't want that and I don't want that. And Natelli, if he were more civic minded, wouldn't want that either.

I'm extremely glad to have you say this is the beginning of a lengthy public process. A couple of virtual Open Houses does not constitute an acceptable public discussion. For that you need people together, in the same space, providing give and take in asking and answering important questions. And we need to have the widest possible publicizing, informing, and reporting, to ensure the county will, on balance, be happy with the process and with the outcome.

As your draft Plan says, this is our "treasured" Sugarloaf region -- treasured not just by us here on Thurston Road, of course, but by the county, the state, and even including Washington, D.C., and northern Virginia. To do it right is to leave a proud legacy to the entire region. I want us to do it right, I want us to leave that legacy of a truly treasured and protected Sugarloaf area, and I want our first charter government to go out on a high note.

My very best regards to you, our council, and our county planners,

Nick Carrera

On 8/5/2021 5:22 PM, Gardner, Jan wrote:

Dear Nick,

Thank you for your email. I appreciate your desire to maintain the current growth boundary at I-270 and your desire for land preservation. The primary goal of the plan is to preserve and protect the Sugarloaf Mountain area as a special and unique place in Frederick County and to have development that is currently allowed in agriculture and resource conservation zoning to happen in a way that is appropriately scaled. I hope you can and do support the majority of the draft plan. I do take exception to some of your assertions. I don't think you can fairly accuse me or any of the council members as being "in the thrall of the developers". Our records clearly suggest otherwise. During my time as County Executive (and the term of two different councils) only two rezoning proposals have been adopted by the council and both were for senior housing. We have also during this same time greatly accelerated our land preservation efforts (including raising the recordation fee to pay for it), adopted the strongest forest protection ordinance in the state, strengthened our Adequate Public Facilities Ordinance and reversed the flawed rezoning of the Monrovia Town Center. I think we are all proud of these accomplishments and most of us will certainly acknowledge that there remains a large pipeline of housing in the county from the massive rezoning decisions from 2012 – 2014 and that additional housing is not needed. I would also share my perspective that all of us dedicate our time to serve in elected office out of a desire to keep Frederick County a special place, to benefit our constituents, to deliver good government and to manage the county well.

The County Council and I have supported and welcomed some businesses and new jobs to the county to hopefully allow more people to live and work in Frederick County. There is a legitimate debate as to whether the land along I-270 particularly near the Urbana interchange should have the future possibility of business/commercial development as part of the I-270 technology corridor or whether the growth line should remain at I-270 with limited or no development near the interchange. The latter is clearly your desire and likely shared by others. There is also a legitimate debate about the boundaries of the Sugarloaf Plan area itself and whether it should extend farther north or not.

This is the beginning of a rather lengthy public process and I encourage you and others to participate in the public process as you have in the past. I can assure you that your view are welcome, desired and respected. Public participation always makes a difference to the outcome.

My best,

Jan Gardner

Frederick County Executive

Winchester Hall

12 E. Church St.

Frederick, MD 21701

301-600-3190

**From:** Nick Carrera [<mailto:mjcarrera@comcast.net>]

**Sent:** Thursday, August 5, 2021 3:40 PM

**To:** Gardner, Jan <[JGardner@FrederickCountyMD.gov](mailto:JGardner@FrederickCountyMD.gov)>; Council Members

<[CouncilMembers@FrederickCountyMD.gov](mailto:CouncilMembers@FrederickCountyMD.gov)>; Donald, Jerry

<[JDonald@FrederickCountyMD.gov](mailto:JDonald@FrederickCountyMD.gov)>; Council Members

<[CouncilMembers@FrederickCountyMD.gov](mailto:CouncilMembers@FrederickCountyMD.gov)>

**Cc:** Carrera, Johnny <[johnnyquercus@me.com](mailto:johnnyquercus@me.com)>; Hartlaub, Martha

<[emhartlaub@earthlink.net](mailto:emhartlaub@earthlink.net)>; Carrera, Nicholas <[mjcarrera@comcast.net](mailto:mjcarrera@comcast.net)>;

Carrera, Alexandra <[sasha.carrera@gmail.com](mailto:sasha.carrera@gmail.com)>; Peake, Chuck & Jonnie

<[chuckLP49@gmail.com](mailto:chuckLP49@gmail.com)>; Kelley, Ridge <[ridgely.kelley@gmail.com](mailto:ridgely.kelley@gmail.com)>; Stoner,

Karla & Bill <[BloomForge@peoplepc.com](mailto:BloomForge@peoplepc.com)>; Kaplan, Peggy

<[Peg.Kaplan@comcast.net](mailto:Peg.Kaplan@comcast.net)>; Goodfellow, Tim

<[TGoodfellow@FrederickCountyMD.gov](mailto:TGoodfellow@FrederickCountyMD.gov)>; Poteat, Steve & Blanca

<[cspoteat@gmail.com](mailto:cspoteat@gmail.com)>; Superczynski, Denis

<[DSuperczynski@FrederickCountyMD.gov](mailto:DSuperczynski@FrederickCountyMD.gov)>; Winkler, George

<[george@winklerautomotive.com](mailto:george@winklerautomotive.com)>

**Subject:** We're about to give Frederick County government a black eye!

[EXTERNAL EMAIL]

Frederick County Executive and Frederick County Council,

*Frederick County is about to get a black eye.*

I'll get right to the point. Someone in the executive office or between the executive office and the Sugarloaf Plan Advisory Group has been persuaded by the developer Tom Natelli to exclude his property west of I270 from the area to be protected under the plan for preservation of the Sugarloaf area. This Sugarloaf Plan is a key part of Jan Gardner's and Frederick County's aim for a Liveable Frederick, and will be seen as a test of our government's effectiveness in establishing our county as a visionary and exemplary county in the state of Maryland.

There is no escaping this: the initial plan included the Natelli property in the Sugarloaf protection area, and the current draft has it clearly excluded. Questions will be asked. Whatever answers county officials may devise, they will fall short, because the answer is too obvious – a developer asked for special treatment and got it.

Our Executive Jan Gardner will be pilloried for not being able to control her new administration and implement her visionary plan for the county. Our County Council will be dismissed as just a continuation of the former County Commission that was always in thrall to the developers. Our Frederick County government will have a black eye!

There is another way, one that appears a “win-win” to me.

The Natelli property should be restored to be part of the Sugarloaf Plan protected area. Thomas Natelli should make a “gracious” donation to the county of his 350 acres, perhaps to become a lovely district park. It will be for benefit of all in the district, but especially will benefit the thousands of residents of his Urbana Villages. He will be esteemed by those who live there and by residents of the Urbana District. And he can probably take a tax write-off. Jan Gardner and County Council members will be hailed for restoring good government to the county and for protecting what is a county, state, and even a regional gem – Sugarloaf Mountain and environs.

To me the choice seems simple. Tom Natelli doesn't need the money from additional development, and he won't mind being seen as a generous humanitarian and preservationist. And our County Executive and our County Council will show that Frederick County is again well governed. It's win-win – for Natelli, for our county, and for our treasured Sugarloaf Mountain area.

My best regards to you all.

Sincerely,

Nick Carrera; Urbana District

(come see me sometime; I'm at 2602 Thurston Road, at Peters Rd: Wellcome Farms, and we mean it)

## **Dolan, Mary**

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**From:** Planning Commission  
**Sent:** Thursday, September 2, 2021 12:07 PM  
**To:** Brandt, Kimberly G.; Goodfellow, Tim  
**Subject:** FW: Sugarloaf Plan

Good afternoon!

FYI, I have sent a thank you response. ☺

Karen

Karen L. James  
Administrative Specialist  
Division of Planning & Permitting  
Frederick County Government  
30 North Market Street  
Frederick, Maryland 21701  
301-600-1138

**From:** bcpoteat@gmail.com <bcpoteat@gmail.com>  
**Sent:** Wednesday, September 1, 2021 11:59 AM  
**To:** Gardner, Jan <JGardner@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>  
**Cc:** Leadership Committee <leadership@sugarloaf-alliance.org>  
**Subject:** Sugarloaf Plan

[EXTERNAL EMAIL]

To County Executive Jan Gardner, Frederick County Councilmembers, and Members of Frederick County Planning Commission,

Please consider carefully these comments regarding the Sugarloaf Treasured Landscape Management Plan. As noted, planning staff developed an exemplary draft plan. The problem lies in the late changes.

Thank you.  
Blanca Poteat  
Member, Sugarloaf Stakeholders Advisory Group

September 1, 2021

### **Draft Sugarloaf Plan - Decision Points** **Blanca Poteat**

**1.Process:** The draft Sugarloaf Plan, part of the new Livable Frederick land use planning process, was well developed and involved constructive community input. The delay of the Plan from March to July, 2021, without explanation or transparency, and the unannounced modification of the Plan's policies and goals and the cut-out or exemption of a developer's properties from the Plan, have compromised the County's overall intentions for the Sugarloaf area west of

I270 and undermined the possibility of achieving the protection and preservation goals stated in the rest of this Plan as well as the overall Livable Frederick initiative.

**2.Potential Development:** Information obtained by the community (not through the planning department which seems to be under non-disclosure agreements – NDAs) indicates that the developer, Natelli, who owns the cut-out properties, currently zoned agriculture and conservation, is already moving forward with demolition of farm buildings, surveying and offers to nearby property owners. Frederick County is not obligated and does not owe this developer preferential treatment and special exceptions because he has taken the risk to purchase the properties and because he has made numerous donations and gifts to individuals and groups.

Whether the developer's plan is residential or, as is strongly suspected, a data center and amazon distribution center, the area on the west side of I270 is inappropriate. Data centers, similar to that which is planned for the former East Alcoa site south of Frederick (and with which Natelli is involved), may be important economic development opportunities for Frederick County, offering essential technological links for latency, redundancy and disaster recovery for the larger region's public and private entities. However, while the Urbana area is an optimal location for another data center (there are two already), the technology do NOT require it to be on the west side of I270. The east side of I270 already has the necessary infrastructure and available land. The fact that an area developer owns some land on the west side of I270 that he wants to monetize does not justify or require the County to compromise the integrity of the Sugarloaf area and this land use Plan.

An Amazon distribution center is another animal entirely. The traffic impact alone makes this use unacceptable for the west side of I270 and the developer's properties there. If Frederick County and Natelli are hungry for an Amazon connection, it should be located in an industrial area like South Frederick where transportation improvements and other infrastructure are already in place.

**3.Legacies:** The Sugarloaf Plan as drafted before March 2021 is an opportunity for the County Executive, County Councilmembers and the entire state, to protect and preserve the Sugarloaf Treasured Landscape as a legacy for the future of "one of the most beautiful and livable parts of the world."

The Sugarloaf Treasured Landscape is the first of several areas in Frederick County slated for similar protection, creating a green scape with the region's waterways and parklands that will gain importance as the County and the world work to limit and reduce the causes and effects of climate change.

This legacy opportunity will not come again. It will be lost if development on the west side of I270 is exempted from the Plan. Such development will lead inevitably and rapidly to inexorable and irrevocable damage to the natural areas and resources which the Plan purports to value.

One other caution is in order: learn from the actions of neighboring jurisdictions. Montgomery County's land use history is moldy with proposals and placements of undesirable projects in the upcounty on the west side of I270 where few votes could influence or overturn them. Pepco and its expansion (which has major impact on the southwest view from Sugarloaf Mountain), a County jail ("detention center" on a site formerly planned for a landfill), a leaf composting facility, an advanced wastewater treatment facility, acreage reserved for a backup landfill, an outer beltway at the County line in view of Sugarloaf, and other projects. The establishment of the agricultural reserve, intended to protect family farms, local food production, and open space, has become primarily an area for estate development and contracted industrial farming operations.

This is NOT about the enjoyment, property values and "lifestyles" of current residents and Sugarloaf Mountain visitors, although those stand to be damaged greatly by the potential developments. This is about whether the County's land use values and ethics or lack thereof will contribute to a sustainable and worthy future or not.

This current Sugarloaf area resident feels like Arthur Dent, the main character in Douglas Adams' book, *The Hitchhiker's Guide To The Galaxy*. The story follows the adventures of Dent, the last human, who hitches a ride off Earth moments before it is destroyed to make way for a hyperspace bypass. Think about it. (FCPL has copies in all kinds of formats for you to borrow.)

**4.Dream Larger:** Have some overarching vision, people. Like the infectious efficiency and tenacity of the coronavirus and its variants, development will expand everywhere if it is unchecked by more far-sighted values and intelligent controls and vaccines.

So "vaccinate" the Sugarloaf region from development on the west side of I270 which will quickly and forever infect and destroy it.

Extend the Sugarloaf Plan to include all lands west of I-270 from the Montgomery County line to the Monocacy River and west to the Potomac River.



Allow Natelli's rumored data center but on the east side of I270 in the southern part of the County. Locate the rumored Amazon distribution center where adequate transportation infrastructure exists, like the South Frederick area (surely Natelli can insinuate his interests there), and require it and all commercial and industrial buildings there and elsewhere to install solar energy panels on all roofs and parking lots.

And on his properties on the west side of I270 in Urbana, inspire or require Natelli to develop an enormous demonstration "climate change" farm and woodlands. Taking the lead with such a visionary project will be a worthy legacy for Natelli and for Frederick County.

The near and more distant future of Frederick County and its citizens will depend on today's intelligent and forward-thinking adaptations in how we live on and use these "treasured landscape" lands.  
Protect them NOW.

Sent from Mail for Windows



# Natelli Communities

September 6, 2021

Members of the Frederick County Planning Commission  
Winchester Hall  
12 E Church Street  
Frederick, MD 21701

Re: Sugarloaf Treasured Landscape Management Plan

Dear Planning Commission Members:

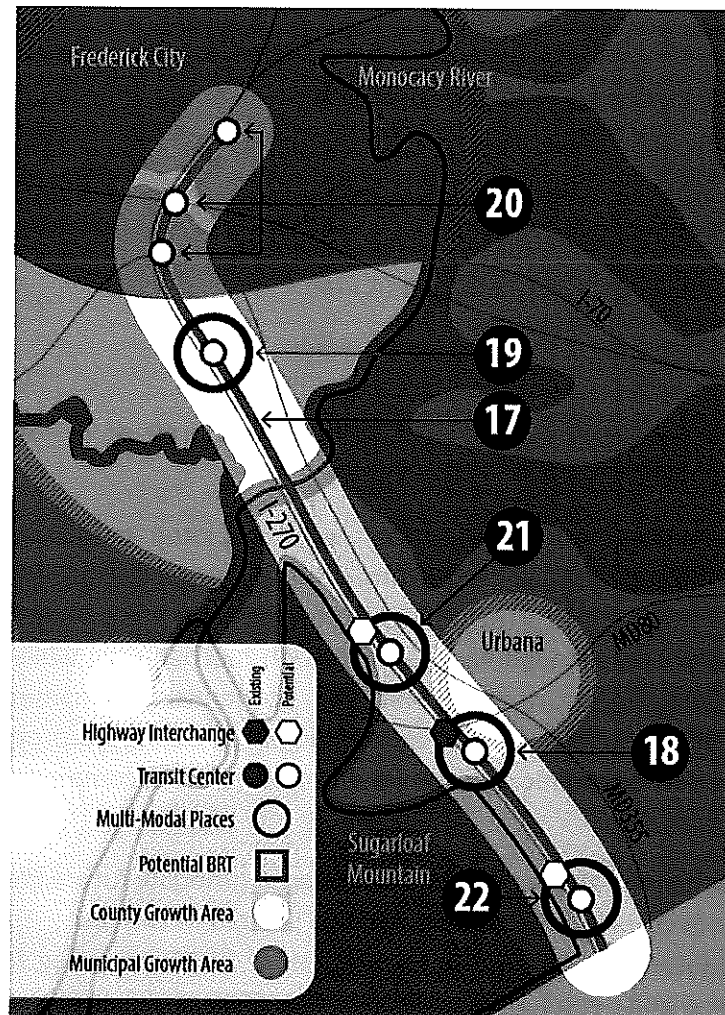
I am writing to share my views with respect to the latest draft of the Sugarloaf Treasured Landscape Management Plan.

The Livable Frederick Master Plan (LFMP) process was completed in 2019 and sought to strike appropriate balances among the many competing goals and needs facing Frederick County over the coming decades. Among those is the desire to preserve large areas of undeveloped privately and publicly owned property through various protection mechanisms, while at the same time preserving opportunities for future residential and economic development to support the continued growth of the community. It was well documented during the process that significant additional residential and economic growth would need to be accommodated over the time frame contemplated in the plan.

The LFMP is straightforward in addressing the need to accommodate future growth and identifies both Primary Growth Sectors and Secondary Growth Sectors in the plan. The Primary Growth Sectors include "The Interstate Corridor" - the section of I-270 extending from Frederick City south to the County line and depicted on page 45 of the LFMP, which is sometimes also referred to as the "Highway Corridor". This is distinct from the Urbana Community Growth Area, which is identified as a Secondary Growth Area and depicted on page 46 of the plan. Several locations along the I-270 Interstate Corridor are identified in the vicinity of Urbana as Primary Growth Areas around which future development should be concentrated. Among these is a location just to the south of the existing interchange of I-270 and Route 80 (please see graphic on next page).

Notably, the demarcation of the line depicting the eastern edge of the Sugarloaf Mountain Rural Heritage area in the LFMP **excludes property on the west side of I-270 in the vicinity of the existing interchange and the Primary Growth Area to its south.** This is consistent with the view that areas along I-270 where significant public and private investment in infrastructure already exists to support development should be retained for future potential development. In the context of the larger objectives of the LFMP, the best way to preserve large expanses of ground in the County is to concentrate development along the corridors where substantial infrastructure already exists.

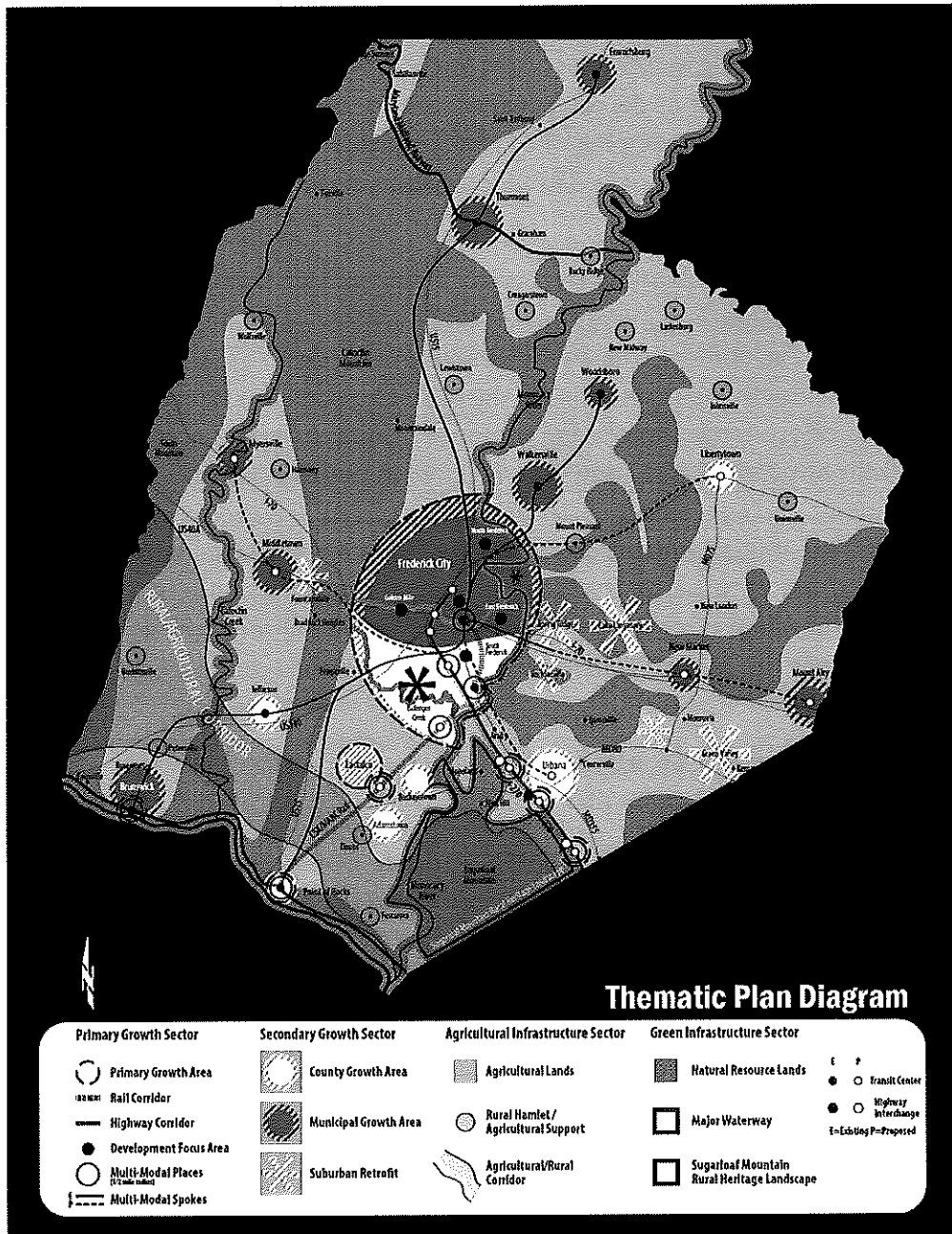
Figure 4: The Interstate Corridor



- 17) Potential Future Mass Transit Corridor
- 18) Urbana Multi-modal Development Surrounding Potential New Transit Station
- 19) Potential Multi-Modal Development at Future Mass Transit Station
- 20) Potential Future Mass Transit Stations
- 21) Potential Multi-Modal Development at Future Mass Transit Station
- 22) Potential Multi-Modal Development at Future Mass Transit Station

When the Sugarloaf study area was initially established as part of the Sugarloaf Treasured Landscape Management Plan planning process, the County **included in the study area** the property along I-270 that had been excluded from the Sugarloaf Mountain Rural Heritage area in the LFMP. This may have been a logical way to take a more granular look at the entire area for planning purposes but it has unfortunately created a misimpression among some people that

the eastern edge of the Sugarloaf Mountain Rural Heritage Landscape area had been established in the LFMP with I-270 as it's eastern boundary in the vicinity of the existing interchange. This is simply not the case. However, it was certainly reasonable for the County, as part of a Large Area Plan study process, to more closely evaluate where the ultimate edge should be set, in the context of meeting the sometimes competing objectives of LFMP.

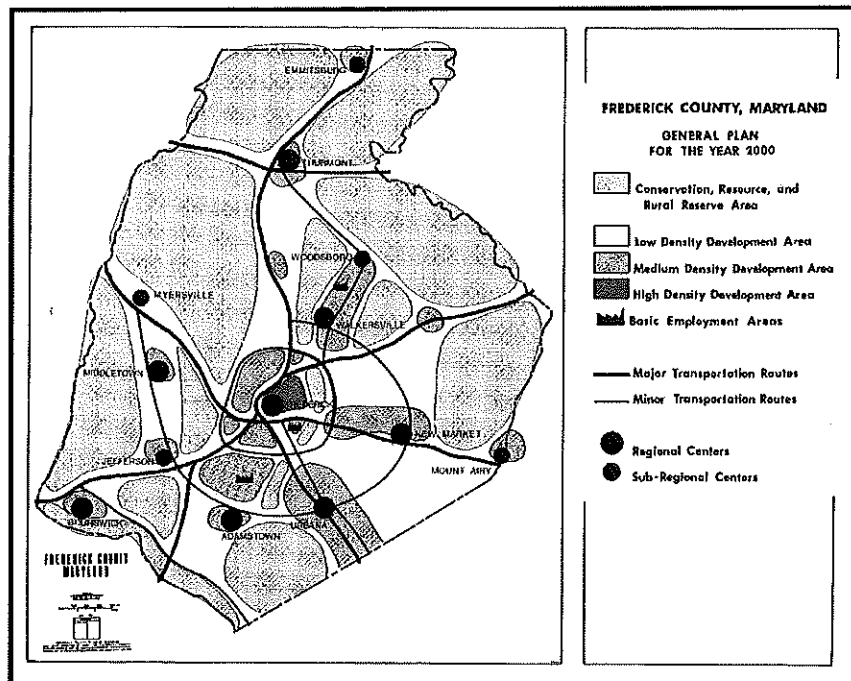


I called attention to this issue early on in the process, and approximately one year ago was able to address this with the Stakeholders Advisory Group. I participated in a conference call in September, 2020, with County staff and Advisory Group members, to explain this discrepancy and to share my views that while I supported the overall objectives of the Overlay that were being contemplated for Sugarloaf, I did not believe LFMP intended for it to apply to the properties in the vicinity of the Interchange, including property we own adjacent to the Interchange and with approximately 1 mile of frontage on I-270. I followed up with staff subsequent to that meeting to provide additional supporting information. These properties are within the I-270 Interstate Corridor Primary Growth Sector as set forth in the LFMP and within a Primary Growth Area. The location of the edge of the Sugarloaf Mountain Rural Heritage Landscape area in the vicinity of the Interchange, as depicted in the LFMP, reflects the fact that these areas should not be painted with the same brush as the 17,000 plus acres to the west that do not share similar characteristics.

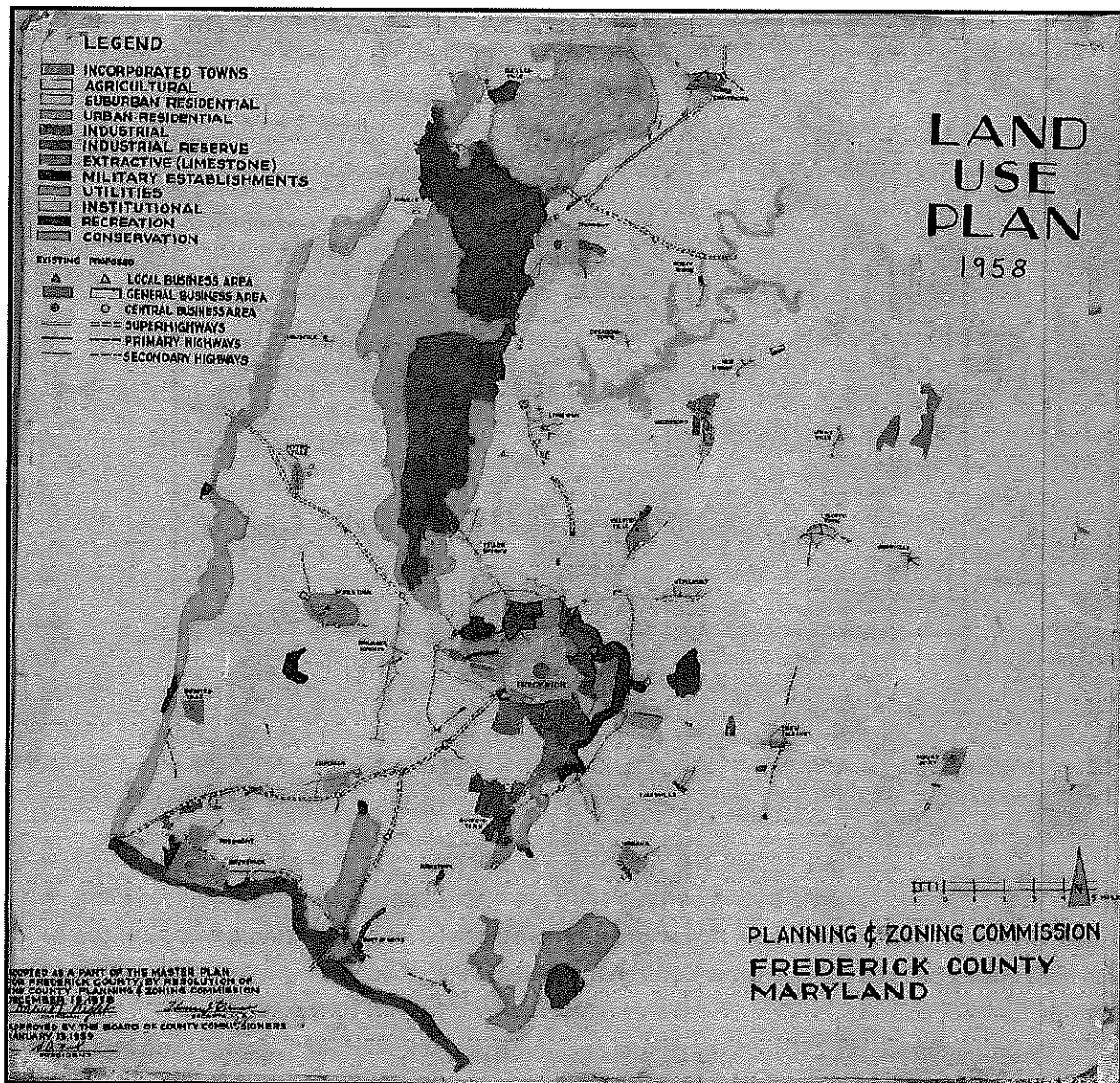
I believe the discussion in the Sugarloaf Treasured Landscape Management Plan on pages 42 and 43 aptly sets forth the rationale for why it makes long-term sense for the County to preserve the potential for future development of a limited amount of property in strategic locations in and around the Primary Growth Areas identified in the I-270 corridor. The Urbana region has become the southern hub of economic activity for Frederick County over the past 20 years. Massive public and private investment has gone into developing the physical and social infrastructure necessary to support and concentrate activity at what currently is the only Interchange in a 10 mile stretch of I-270. It is incumbent on the County to strike a balance among the competing goals of the LFMP, if it is to be successful in delivering on the promise of LFMP. Preserving opportunities for development in key locations, where long-term growth needs can be concentrated, reduces the growth pressures on other areas where preservation can be more thoughtfully pursued.

In my view the changes made by staff to the boundary of the Sugarloaf Treasured Landscape Management Plan now fully align the plan with the overall intentions set forth in LFMP.

It seems to me there has been a significant amount of misinformation circulating in the community about the Sugarloaf plan and this has created some basic misunderstandings. Among these misunderstandings is a view being perpetuated that the County has never contemplated development on the west side of I-270. LFMP itself, allows for development on the west side of I-270, and this is not inconsistent with prior long-term planning efforts by the County. Below please find a copy of the General Plan for Frederick County, from the year 2000. To put this in context, we began work in the Urbana region in the 1990's. Please take note that the General Plan for Frederick County in the year 2000 contemplated significant development on both sides of the I-270 corridor through the Urbana region.



In fact, as far back as Frederick County's land use plan dating to 1958, development was contemplated on both sides of the highway around the Interchange in Urbana. A copy of the Land Use Plan dating back to 1958 is shown on the following page. If you look closely, you will see that even as far back as 1958, development was contemplated for the future on the west side of the highway (then named US-240) in the Urbana region. The properties identified in blue and red on that plan at the Urbana Interchange are on the west side of the highway.



Frederick is a growing community. If Frederick is going to be a place where people live, work and thrive in the coming years, Frederick needs additional spaces for its residents to live, work and thrive. The Livable Frederick Master Plan acknowledges this very thing and has afforded the opportunity for this to happen in the Urbana region in key locations along I-270. Among them are the properties in the vicinity of the Interchange on the west side of I-270.

Sincerely,

Tom Natelli, CEO  
Natelli Communities



## Goodfellow, Tim

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**From:** Planning Commission  
**Sent:** Tuesday, September 7, 2021 9:33 AM  
**To:** Brandt, Kimberly G.; Goodfellow, Tim  
**Subject:** FW: Comments on the Sugarloaf Treasured Landscape Management Plan

Good morning!

FYI, I have sent a thank you response. ☺

Karen

Karen L. James  
Administrative Specialist  
Division of Planning & Permitting  
Frederick County Government  
30 North Market Street  
Frederick, Maryland 21701  
301-600-1138

---

**From:** Deb. Gardner <deb.gardner@verizon.net>  
**Sent:** Monday, September 6, 2021 4:27 PM  
**To:** Gardner, Jan <JGardner@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>  
**Subject:** Comments on the Sugarloaf Treasured Landscape Management Plan

[EXTERNAL EMAIL]

I write as a resident of Frederick County who enjoys recreation in the Sugarloaf area, frequent visits to the land of dear friends west of Urbana where I enjoy the wildlife and especially the birds, and participating in a Community Sustainable Agriculture farm to access beautiful organic produce from the land west of I-270 in southeast Frederick County.

The Sugarloaf Treasured Landscape Management Plan has major implications for these areas.

In particular, the draft plan poses a threat to the Ag Reserve and surrounding areas by exempting a 490-acre property west of I-270 at Fingerboard Rd. This property was not exempted in the earlier version of the plan and thus would have been subject to strict conservation and environmental protection measures that protect natural resources and limit residential development.

I've learned that an Urbana-based developer owns the land. I oppose the exemption in the strongest terms. Though the parcels in question are currently zoned mostly for agriculture, the exemption could eventually lead to the land being zoned for full commercial and residential development, which is apparently the developer's goal. There is no need, and certainly no desire among the current residents and users, for suburban development west of I-270.

Why do the conservation measures in the proposed plan not apply equally to this land?

Please serve the interests of all County residents and restore all land west of I-270 to the Sugarloaf Treasured Landscape Management Plan.

Debra Gardner  
336 E Church St



## Goodfellow, Tim

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**From:** Planning Commission  
**Sent:** Tuesday, September 7, 2021 9:32 AM  
**To:** Brandt, Kimberly G.; Goodfellow, Tim  
**Subject:** FW: please reconsider development in the Sugarloaf area west of 270

Good morning!

FYI, I have sent a thank you response. ☺

Karen

Karen L. James  
Administrative Specialist  
Division of Planning & Permitting  
Frederick County Government  
30 North Market Street  
Frederick, Maryland 21701  
301-600-1138

---

**From:** Lesli/Douglas Summerstay <summerstay@gmail.com>  
**Sent:** Sunday, September 5, 2021 7:00 PM  
**To:** Gardner, Jan <JGardner@FrederickCountyMD.gov>; Planning Commission <PlanningCommission@FrederickCountyMD.gov>; Council Members <CouncilMembers@FrederickCountyMD.gov>  
**Subject:** please reconsider development in the Sugarloaf area west of 270

[EXTERNAL EMAIL]

We would like to encourage you to reconsider the change to the development in the Sugarloaf Area Plan, and remove the area west of 270 from planned development. Allowing this to go forward will surely lead to rapid expansion in that area and eventually ruining the forested Sugarloaf mountain area. Instead we would ask you to redraw the line along 270.

Lesli and Douglas Summers-Stay

--

<http://dsummerstay.googlepages.com>

